

EXHIBIT 69

CBS LOCAL DIGITAL MEDIA **PRIVACY POLICY**

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Last Modified Date: May 24, 2018

The CBS Local Privacy Policy (the "Privacy Policy") has been updated. Please review the updated privacy policy carefully before using the CBS Local Services. By using any CBS Local Service, you consent to the terms of the updated Privacy Policy. [Click here](#) for more information about the updates.

Welcome to the network of interactive services provided by CBS Local Digital Media, a CBS Broadcasting Inc. business, its affiliates and its subsidiaries (collectively "CBS Local", "us" or "we"). CBS Local is committed to protecting your privacy. CBS Local owns, operates, or provides access to, several websites, mobile and connected TV applications, email newsletters and other online interactive features and services that provide an authorized link or URL to this Privacy Policy (collectively, "CBS Local Services" or "Services"). This Privacy Policy applies only to the CBS Local Services.

This Privacy Policy describes, among other things, the types of information collected about you when you visit the CBS Local Services; how your information may be used and when it may be disclosed; how you can control the use and disclosure of your information; and how your information is protected. Trust is a cornerstone of our mission at CBS Local. We are committed to gaining and maintaining your trust by following a core set of Privacy Principles.

Scope of Privacy Policy

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This Privacy Policy applies to information, including contact information, collected about you by the CBS Local Services. Please review this Privacy Policy carefully. In addition, please review our [Terms of Use](#), which governs your use of the CBS Local Services.

Information Collected

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Information you provide directly to CBS Local Services.

You are not required to provide information about yourself when you visit a CBS Local Service. CBS Local may ask you for different types of information when you register for certain Services, access various content or features, or contact the Services directly, including:

- Contact information, such as name, email address, postal address, phone number, facsimile number, and mobile number;
- User name, password, and password reminder questions and answers;
- Age and date of birth;
- Other demographic information, such as gender, job information, and postal code;
- Public information, including profile information, you provide to the CBS Local Services for publication, such as your user name, comments, likes, interests, status, pictures and the address of your website;

- Communications preferences, such as which newsletters you would like to receive;
- Search queries;
- In limited circumstances, payment and identity verification information, such as credit card number, social security number or comparable national identifiers, and driver's license number where needed for payment, to complete a particular transaction, or to access a particular service (e.g., contests);
- Contact information about others when you provide information about others or refer a friend to a particular website or service (note: such information is used solely to facilitate the communications requested);
- Information posted in community discussions and other interactive online features;
- Correspondence you send to us; and
- Information collected about you offline (including via facsimile, postal mail, or in person for sweepstakes entrance forms).

Information we collect automatically on CBS Local Services.

CBS Local Services may collect certain information automatically, including:

- Your browser type and operating system;
- Your Internet Protocol (IP) address, which is the number automatically assigned to your computer whenever you access the Internet and that can sometimes be used to derive your general geographic area;
- Websites you visited before and after visiting a CBS Local Service;
- Web pages and advertisements you view and links you click on within CBS Local Services;
- Unique identifiers, including mobile device identification numbers, that can identify the physical location of such devices in accordance with applicable law;
- Information collected through [cookies](#), [web beacons](#) and [other similar technologies](#);
- Information about your interactions with audio and video content, such as the type of content listened to (including music applications such as iTunes, Spotify and Last.fm) and content viewed, and information about your interactions with email messages, such as the links clicked on and whether the messages were opened or forwarded;
- Upon request, your bandwidth speed and information about the software programs installed on your computer; and
- Standard server log information.

Information we obtain from other sources

Where permitted by applicable law, we may collect information about you from other sources, including through interactive applications (e.g., mobile devices, third party services, and embedded audio and video players), from co-branded partners and websites (for example, on our Facebook pages), and from commercially available sources (such as data aggregators and public databases). The following are examples of information we may collect from other sources:

- Name, postal address, and telephone number;
- Demographic data, such as age, gender, and income level;
- If you access third party services (e.g., Facebook, Google+ or Twitter) through a CBS Local Service, your username and password for those services and other information available about you on those services, as described in our [Video Services and Social Networking Policy](#);
- Your interests and purchase behavior;
- Publicly-observed data, such as activities on blogs, videos, and other online postings; and
- Other navigation data, such as websites visited and advertisements viewed or clicked on.

This Privacy Policy does not cover the [practices of third parties](#), including those that may disclose information to CBS Local.

Combining Information

Please note that all of the information we collect about you may be combined, including to help us tailor our communications to you and to develop rich online content and services across the CBS Local Services.

Use of Information

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We only use payment and identity verification information, such as credit card numbers, driver's license numbers, social security numbers, or comparable national identifiers as necessary for completing a particular transaction or fulfilling a service (e.g., paid subscriptions or awarding prizes to contest winners) or as otherwise required by law.

We generally use other information we collect about you to:

- Fulfill your requests for products, services, and information, including to send you electronic newsletters, authorize a purchase, and complete a transaction that you have requested;
- Enable you to participate in features such as surveys, polls, sweepstakes and message boards;
- Provide you with special offers and promotional materials on behalf of CBS Local Services, companies within our corporate family, and third parties, in accordance with applicable law;
- Analyze the use of CBS Local Services and information about visitors to our Services to understand and improve our offerings and, in accordance with our sharing policies, discussed below, to produce anonymous or aggregated data and statistics that might help third parties develop their own products and service offerings;
- Customize the content you see when you visit a CBS Local Service;
- Develop and provide advertising tailored to your interests, as described in our overview of [CBS Local Online Advertising](#);
- Prevent potentially prohibited or illegal activities and otherwise in accordance with the [CBS Local Terms of Use](#); and
- For any other purposes disclosed to you at the time we collect your information or pursuant to your consent.

Disclosure of Information Collected

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CBS Local is committed to maintaining your trust and we want you to understand when and with whom we may share information collected about you.

With Your Consent

With your consent, we may share your contact information with third party marketing partners. For example, CBS Local Services such as Eventful offer updates about local events if you allow your information to be shared with third-parties so that they may contact you by email, postal mail, telephone or other common communications methods about their events, products or services.

Authorized Third Party Service Providers

We share your contact information with third party vendors who help us with specialized services, including customer support, email and text message deployment, business analytics, marketing, suppression list management, and data processing. These third parties are allowed to use your contact information to help us provide our services and not for any other purpose. Also, authorized third party service providers may collect non-contact information about your visits to our Services with cookies, web beacons and other similar technologies that may be used to deliver advertisements tailored to your interests. For more information, visit our overview on [cookies, web beacons and other similar technologies](#) (including Do Not Track).

Sweepstakes, Contests, or Promotions

When you choose to enter a sweepstakes, contest, or other promotion, and in accordance with the terms and conditions of the promotions, your information may be disclosed to our sponsors and to third parties who help administer the promotion, including in connection with winner selection prize fulfillment and aggregated data analysis. Your information also may be disclosed as required by law, such as on a winners list. Further, by entering a promotion, you are agreeing to the official rules that govern that promotion, including allowing our sponsors to use your name, voice, and likeness in advertising and marketing associated with the promotion in accordance with applicable law. All terms applicable to the particular promotion will be made available to you at the time you enter the promotion.

Co-Branded Partners

Co-Branded Partners are third parties with whom a CBS Local Service may offer jointly a service or feature. You will be able to tell when you are accessing a service or feature offered by a Co-Branded Partner, because the Co-Branded Partner's name will be featured prominently. You may be asked to provide information about yourself to register for a service offered by a Co-Branded Partner. By doing so, you may be providing your information to both us and the Co-Branded Partner, or we may share your information with the Co-Branded Partner. Please note that the Co-Branded Partner's privacy policy may also apply to its use of your information.

CBS Local Services and Other CBS Businesses

CBS Local and other business units of CBS Corporation, our parent company, continue to expand their online presence in order to offer users rich and deep interactive experiences. Where permitted by law, we may share information we collect about you within the family of CBS Local businesses, with [CBS Corporation](#), and with other [CBS-affiliated companies](#), so that we can provide you with information about products and services that might interest you.

Business Transfers

We may share your information in connection with a substantial corporate transaction, such as the sale of a CBS television station participating in the CBS Local Services, a merger, consolidation, asset sale, or in the unlikely event of bankruptcy.

Legal Requirements

We may disclose information about our users, including contact information, to respond to subpoenas, court orders, legal process, and other law enforcement measures, and to comply with other legal obligations, such as [FCC requirements](#).

Protect CBS Local Services and Users

We may disclose information to protect and defend the legal rights, interests, and safety of CBS Local Services, other CBS companies, and their employees, agents, and contractors (including enforcing our agreements); to protect the safety and security of users of the Services and members of the public; and as otherwise disclosed in the [CBS Local Terms of Use](#).

Please note that we may share information with advertisers as described in our overview of [CBS Local Online Advertising](#).

In addition, information collected about your interactions with audio and video content may be shared with third parties, including third party social networking services such as Facebook, and video measurement and subscription services such as Nielsen, as described in our overview of [video services and social networking](#).

Finally, we also may share aggregated or anonymized information with third parties to help us develop content and services we hope will interest you or to help these third parties develop their own product and service offerings, including targeted marketing, as described in our overview of [third party online advertising](#).

Your Choices

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You can choose to enjoy content and features on CBS Local Services without providing us directly with any information about you; however, as described above, some information may be collected automatically or be requested so that you can take advantage of certain features and services offered on CBS Local Services.

You can opt out of receiving commercial email or text messages from a particular CBS Local Service or other service by following the instructions contained in any such message or by [contacting us](#) directly. Please note that even if you unsubscribe to commercial messages, we may still need to send you communications relating to your use of the CBS Local Services, such as service announcements.

You have choices about whether cookies and other similar technologies are placed on your computer or mobile device. For more information, visit our overview on [cookies, web beacons and other similar technologies](#) (including Do Not Track).

Finally, you also have choices about the collection and use of your information by third parties to display relevant advertisements, as described in the section on [Third Party Online Advertising](#).

Access

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If you choose to share contact information with us, you may have the opportunity to update that information on a CBS Local Service. You also may update or amend your information by [contacting us](#). If you ask us to shut down your account or delete your information, we will disable your account within a reasonable period of time. Please note that we may need to retain some information about you in order to satisfy our legal and security obligations. For example, some of your information may remain in backup storage even if you ask us to delete it. In some cases, you may be entitled under local laws to access or object to the processing of information that we hold relating to you.

Protection of Information

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We are committed to protecting your information. We have adopted commercially reasonable technical, administrative, and physical procedures to help protect your information from loss, misuse, unauthorized access and alteration. Please note that no data transmission or storage can be guaranteed to be 100% secure. We want you to feel confident using CBS Local Services, but we cannot ensure or warrant the security of any information you transmit to us. Please refer to the [U.S. Federal Trade Commission's website](#) for information on how to protect yourself from identity theft.

Transfer of Data Internationally

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CBS Local is headquartered in the United States and has affiliates and partners in other countries. Please be aware that information you provide to us or that we obtain as a result of your use of the CBS Local Services may be collected in your country and subsequently transferred to the United States or another country in accordance with applicable law. The privacy and data protection laws in the country to which your information is transferred may not be equivalent to such laws in your country of residence. By using and participating in any CBS Local Services or providing us with your information, you consent to the collection, international transfer, storage, and processing of your information.

California Visitors

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For additional information for residents of the State of California, click [here](#).

CBS Local Privacy Protections for Children

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Most CBS Local Services are intended for a general audience and do not knowingly collect or store contact information about children under the age of 13. Some CBS Local Services may ask for your full date of birth to ensure that they are not collecting information from children under 13 or to identify when additional steps may need to be taken when information has been collected from children under 18. In instances where a CBS Local Service has actual knowledge that it collects information from children, or offers a service directed toward children as defined under applicable laws, it will comply with those laws. To read about our privacy policy for children under the age of 13, please see the [CBS Local Children's Privacy Policy](#).

European Union (EU) Visitors

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European Union (EU) Visitors

This section of the Privacy Policy applies only if you use our websites or Services covered by the Privacy Policy from a country that is a Member State of the European Union, and it supplements the information in the Privacy Policy.

CBS Local is the data controller for processing of information defined as personal data under applicable data protection law ("Personal Data").

LEGAL BASIS FOR DATA PROCESSING

We process Personal Data for the purposes set out in the Privacy Policy. Our legal basis to process Personal Data includes processing that is: necessary for the performance of the contract between you and CBS Local (for example, to provide you with the Services you request); necessary to comply with legal requirements (for example, to comply with applicable accounting rules and to make mandatory disclosures to law enforcement); necessary for our legitimate interests (for example, to manage our relationship with you and to improve the website and our Services); and based on consent by our customers (for example, to communicate with you about our products and services and provide you with marketing information), which may subsequently be withdrawn at any time by contacting us (using the contact instructions below) without affecting the lawfulness of processing based on consent before its withdrawal.

EU DATA SUBJECT RIGHTS

The EU General Data Protection Regulation (GDPR) provides certain rights for EU data subjects. You may decline to share certain personal information with us, in which case we may not be able to provide some of the features and functionality of our Services. These rights include, in accordance with applicable law, the right to object to or request the restriction of processing of your Personal Data, and to request access to, rectification, erasure and portability of your own Personal Data. Requests should be submitted by contacting us (using the contact instructions below).

You may make changes to the personal information collected by contacting us directly. We will make commercially reasonable efforts to provide you reasonable access to your personal information within 30 days of your access request to the contact address below. We provide this access so that you may review, make corrections, or request deletion of your personal information. If we cannot honor your request

within 30 days, we will inform you when we will be able to provide such access. If for some reason access is denied, we will explain why access is denied. When technically feasible, at your request, we will provide your personal data to you.

We will retain your personal information for as long as it is reasonably necessary for the purposes set out in the Privacy Policy, considering the time period reasonably necessary to: provide the Services to you; exercise the choices and rights you have requested; comply with our contractual obligations; enforce our terms for use of the Services; and, comply with legal and regulatory requirements.

If you have any unresolved privacy concern that we have not addressed satisfactorily after contacting us, you have the right to contact the appropriate EU Data Protection Authority and lodge a complaint.

THIRD PARTY ONLINE ADVERTISING

We enable certain third party advertising exchanges to place advertisements on our sites. With your consent, those advertising exchanges collect your IP address and/or a unique advertising ID that is used by the advertising exchange to identify you across the internet.

The European Digital Advertising Alliance ("EDAA") has developed a guide to online behavioural advertising and has developed an opt out page to manage online behavioral advertising preferences with EDAA member companies available at www.YourOnlineChoices.com. To find out more about how you can manage cookies and the other similar technologies, see [Managing Cookies](#)

AUTOMATED DECISION MAKING

We use automated decision-making technologies, including profiling, to support our data processing activities. These include services designed to develop and provide advertising tailored to your interests, as described in our overview of CBS Local Online Advertising and to customize the content you see when you visit a CBS Local Service.

CONTACT US

For all EU Data Subject Rights requests, please [contact us](#). You must put the statement "Your EU Data Subject Rights" in the subject field of your request, and include in your request the name of the Services with respect to which you are requesting the information, as well as your contact information. If you prefer to submit your questions or comments by mail, please send a letter to the following address:

CBS Local Digital Media
1700 Broadway, 7th Floor
New York, NY 10019
ATTN: Privacy Officer

User-Generated Content

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Some CBS Local Services enable users to submit their own content for use in contests, blogs, over-the-air radio and television broadcasts, online audio and video streams, message boards, and other functions. Publication of user-generated content on the CBS Local Services is subject to our [Terms of Use](#). Please remember that any information you disclose becomes public information and to exercise caution when choosing to disclose your contact, financial, and other information in a submission. We cannot prevent such information from being used in a manner that may violate this Privacy Policy, the law, or your personal privacy and safety. You should also be aware that we may also engage a third party to provide some of the services associated with the blogs, message boards and similar functions. This third party will collect and host the information that you submit to the CBS Local Services, but will not use any of this information for purposes other than providing the service.

Third Party Websites and Services

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Please note that some CBS Local Services may contain links to other websites and services. We are not responsible for the privacy practices of those websites, and we recommend that you review the privacy policies of each website that you visit. When you select a link to a third party website from a CBS Local Service (e.g., if you link to PayPal to pay for a product or service offered by a CBS Local Service), you will be leaving the CBS Local website. Any information that you disclose on the third party website will be governed by that website's privacy policy.

Changes to this Privacy Policy

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We may update this Privacy Policy to reflect changes in our practices and service offerings. If we modify our Privacy Policy, we will update the "Last Modified Date" and such changes will be effective upon posting. If we make any material changes in the way we use your information, we will notify you by email through the email address you most recently provided to us or by posting a prominent notice of the changes on the CBS Local Services.

Questions

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If you have questions regarding this Privacy Policy, please [contact us](#) and we will endeavor to respond to your request within a reasonable period of time. You may also submit questions or comments using the postal address listed below:

CBS Local Digital Media
1700 Broadway, 7th Floor
New York, NY 10019
Attn: General Counsel

We are committed to working with you to obtain a fair resolution of any privacy concern

Cookies, Web Beacons and Other Similar Technologies

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Cookies are small amounts of data that are stored in separate files within your computer's Internet browser. Cookies are accessed and recorded by the websites you visit, and by the companies that show advertisements on these websites, so that they can recognize the same browser.

Web beacons (sometimes called transparent GIFs, clear GIFs, or web bugs) are small strings of code that provide a way for us to deliver a small graphic image (usually invisible) on a web page or in an email. Web beacons can recognize certain types of information on your computer such as cookies, the time and date a page is viewed, and a description of the page where the web beacon is placed.

How CBS Local Services Use Cookies, Web Beacons and Other Similar Technologies

CBS Local Services use cookies, web beacons and other similar technologies for the following general purposes:

- To help us recognize your browser as a previous visitor and to save and remember any preferences that may have been set while your browser was visiting one of our Services. For example, if you register on a CBS Local Service, that Service may use a cookie to identify you so that you will not have to log in each time you visit the Service.
- To help us customize the content and advertisements you are shown while visiting CBS Local Services and potentially other websites. Please read [CBS Local Online Advertising](#) to learn more about our efforts to show you relevant advertising.
- To help measure and research the effectiveness of our online content, features, advertisements and other communications.
- CBS Local Services may also allow third parties to place their own cookies within your browser in order to serve you relevant advertising online, to help us measure traffic and effectiveness as described above, to provide you with access to social media networks, functionality and services, and to allow us to conduct surveys and research in which you agree to participate. For instance, [Facebook](#), [Google](#) and [Twitter](#) place their cookies on CBS Local Services to support social network integration and functionality and for use according to their respective privacy policies. For more information, please see the [Video Services and Social Networking Policy](#).
- Web beacons are used to improve your experience on the CBS Local Services, including helping provide you with content customized to your interests. They also help us understand whether users read email messages and click on links contained in those messages so that we can deliver relevant content and offers. Our web beacons may collect some contact information (e.g., the email address associated with an email that contains a web beacon).
- CBS Local Services also may include third party web beacons. These web beacons allow third party service providers to collect certain information such as your IP address, your browser type, and the web page that you visited before arriving at and after leaving CBS Local Services. These service providers process the information they collect to audit, research, and report information about the CBS Local Services and advertisements viewed on the CBS Local Services. Third parties that use cookies, web beacons and other similar technologies to help us with traffic measurement, research and analytics include [Adobe Analytics](#), [comScore](#), [Google Analytics](#), [Nielsen](#), and [ConfirmIT](#). Please note that we do not share your contact information with these third parties.

Also, authorized third party service providers may collect non-contact information about your visits to our Services with cookies, web beacons and other similar technologies that may be used to deliver advertisements or marketing tailored to your interests. These third parties may collect information about your online activities over time and across different websites. To opt out of targeted advertisements on third party sites, please see the [Managing Third Parties' Behaviorally Targeted Advertising Cookies on Your Computer](#) section of this Privacy Policy.

When you use our search function, your web browser also may send the Internet address, or URL, of the search results page to a third party webpage as part of standard HTTP web protocol. The URL of the search results page may sometimes contain the keywords used in the search query you entered. Some of the advertisements you see may be based on these keywords.

By continuing to use CBS Local Services, you consent to our use of cookies, web beacons and other similar technologies as described above.

To find out more about how you can manage cookies, web beacons and the other similar technologies, see the [Managing Cookies](#) section of this Privacy Policy.

How Third Parties Use Cookies and Other Similar Technologies

Some of the advertisements you see on CBS Local Services are delivered by third parties who also collect information through cookies, web beacons and other similar technologies about your online activities, either on our Services or across the Internet, so that they may understand your interests and deliver advertisements that are tailored to your interests. These third parties include advertisers, advertising agencies, and ad networks that may collect information when you view or interact with one of their advertisements. To learn more, please read the [Third Party Online Advertising](#) section of this Privacy Policy.

In addition, CBS Local works with third parties to help us track the advertisements that are delivered to you to control the number of times you receive the same advertisement, and to analyze the effectiveness of advertising on the CBS Local Services.

Please note that CBS Local does not have access to the information these third parties may collect about your interests to deliver relevant advertising to you. The information practices of these third parties are not covered by this Privacy Policy. Third parties that may serve, track and/or analyze advertisements on our Services, and thereby may collect information about your online activities on such Services include, but are not limited to [AdsWizz](#), [comScore](#), [eXelate](#), [Google/DFP](#), [LiveIntent](#), [Moat](#), [Nielsen](#) and [Triton Digital](#).

To find out more about how you can manage the information collected by these companies, see the [Managing Cookies](#) section of this Privacy Policy.

Do Not Track

Some Internet browsers include the ability to transmit "Do Not Track" signals. Since uniform standards for "Do Not Track" signals have not been adopted, CBS Local Services do not process or respond to "Do Not Track" signals. To learn more about "Do Not Track", please visit "[All About Do Not Track](#)".

Mobile Devices

Certain mobile devices provide various capabilities that can be used, for example, to identify the physical location of such devices. Mobile devices also transmit Caller ID data when a call is made or text message is sent. CBS Local Services may collect, use, transmit, process and maintain unique identifiers, Caller ID data, location-based data, and other similar information when you use your mobile devices, including to provide the services you request, tell you about offers we think you will value and improve your experience on CBS Local Services. CBS Local Services also may require you to provide your mobile phone number to participate in certain services or features and that number may be associated with such information.

Managing Cookies

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Whether cookies are placed on your computer or mobile device is something you can control. This section describes how you can manage the cookies that are placed on your computer or mobile device by CBS Local and third parties.

Managing Third Parties' Behaviorally Targeted Advertising Cookies on Your Computer

A number of companies that use cookies to collect information about your online activities using web-based advertising are members of the [Network Advertising Initiative](#) ("NAI"). The NAI offers a single location to opt out of receiving tailored ads from member companies. To opt out of information collection by NAI member companies, or to obtain information about the technologies they use or their own privacy policies, please visit the [NAI consumer opt-out](#) page. Also, through the Digital Advertising Alliance ("DAA"), several media and marketing associations have developed an industry self-regulatory program to give consumers a better understanding of and greater control over ads that are customized based on their online behavior across different websites. To make choices about interest-based ads from participating third parties, please visit the [DAA consumer opt-out](#) page.

If you opt out of having your information used to deliver advertisements tailored to your interests, you will continue to see advertisements on our Services, but these advertisements may not be as relevant to you.

Adjusting Your Browser Settings

You have the option to set your browser to accept all cookies, reject all cookies, notify you when a cookie is set, and delete cookies periodically (including third party behaviorally targeted advertising cookies). Each browser is different, so please refer to the guide below, which describes how to set the cookie options on a number of different browser types. If your browser is not listed below, please visit [All About Cookies](#), where you may find more information about your specific browser, or select the "Help" menu in your browser.

Web beacons are generally used in conjunction with cookies, so if your browser is set to reject cookies, or if you delete cookies, web beacons will not be able to track your activity as you navigate between websites.

It is up to you whether to allow us or third parties to send you cookies, but if you block cookies, you may not be able to view or access some or all of a CBS Local Service or other websites.

Below you'll find directions to help you disable cookies in some of the most popular desktop browsers and mobile browsers.

Mozilla Firefox version 3.5 or later

- In the "Tools" menu, select "Options"
- Under the "Firefox will:" dropdown, select "Use custom settings for history"
- Uncheck the "Accept Cookies from Sites" box to block all cookies Or
- Click the "Exceptions" button to enter specific websites that you wish to allow/disallow to set cookies

Internet Explorer version 6 or later

- In the "Tools" menu, select "Internet Options"
- Click the "Privacy" tab
- Move the "Settings" slider up or down to adjust your cookie acceptance settings (moving the slider all the way to the top will block all cookies) or
- Click the "Sites" button to enter specific websites that you wish to allow/disallow to set cookies

Google Chrome version 4 or later

- Click the wrench icon in the top right of your browser window
- Select "Options"
- Click the "Under the Hood" tab
- Click the "Content Settings" button
- Click the option to "Block sites from setting any data" to block all cookies Or
- Click the "Exceptions" button to enter specific websites that you wish to allow/disallow to set cookies

Safari version 4 or later

- Click the geared wheel icon in the top right of your browser window.
- Select "Preferences"
- Select the "Security" tab
- Under "Accept Cookies:", click the "Never" option to block all cookies

Disabling cookies in popular mobile browsers:

Mobile Safari

- From your home screen on your iPhone or iPad, click "Settings"
- Click on "Safari"
- Click on "Accept Cookies"
- Select "Never" to block all cookies

Android for Mobile

- From within the Android browser, hit the menu key.

- Select "More"
- Select "Settings"
- Uncheck the "Accept Cookies" option to block all cookies

Opera Mini on a Blackberry device

- From within the Opera Mini browser, press the menu key.
- Scroll down to access the drop down menu of options
- Select "Settings"
- Select "Privacy"
- Change the "Accept cookies" option to "Off" to block all cookies

Managing Flash Cookies

Flash cookies, also called local shared objects (LSOs), function similarly to standard cookies except that they are often larger and are downloaded to a computer or mobile device by the Adobe Flash Player. In some cases, these Flash cookies can be managed through browser settings. Adobe also provides a means of controlling Flash cookies on its Flash Player: Setting Manager page.

Managing Cookies on CBS Local Mobile Applications

CBS Local may place cookies on your mobile device if you download CBS Local applications ("Apps"). These cookies are used for many of the same purposes identified in the [Cookies, Web Beacons and Other Similar Technologies](#) section of this Privacy Policy. You may be provided with an opportunity to reject cookies before downloading a CBS Local App, but by downloading an App, you will be deemed to have consented to the collection of information from your mobile device.

CBS Local Online Advertising

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In order to customize your experience on the CBS Local Services, we may use [cookies, web beacons and other similar technologies](#) to collect information about the content and advertisements you view on our Services and the websites of our business partners. Based on this and other information we may collect about you as described in the [Information Collected](#) section of this Privacy Policy, we try to infer your interests and show content and advertising that is more relevant to you. For example, if you access an article about computers on one CBS Local Service, we may show you a computer-related advertisement on another CBS Local Service based on your apparent interests.

We also may receive information from third parties about you and your activities on other websites for the purpose of serving relevant advertisements to you. For example, if you access an article on a third party website about computers, we may use that information to serve you with a computer-related advertisement on a CBS Local Service.

Please note that we may share information about our users with advertisers so that they can measure the effectiveness of advertisements viewed on the CBS Local Services. For example, we may tell advertisers the number of users who clicked on a particular advertisement. We may also use technology, e.g., [Facebook Custom Audiences](#) and [Measured Marketing](#) to deliver advertising to you on other websites based on the email address or other personal information you provided to us or through the use of information we received from third parties. This Privacy Policy does not cover the practices of third parties, including those that may disclose information to CBS Local.

These online-advertising efforts across CBS Local Services do not result in you seeing more advertisements, just more relevant advertising, and they allow us to provide you with free content and services on CBS Local Services. We hope you value our efforts to show you content and advertising that more closely reflects your interests.

Some of the advertisements you see on CBS Local Services are delivered by third parties. To learn more, please read our overview on [third party online advertising](#).

Third Party Online Advertising

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Some of the advertisements you see on the CBS Local Services are delivered by third parties who also collect information through their own cookies, web beacons and other similar technologies about your online activities, either on our Services or across the Internet, in an effort to understand your interests and deliver advertisements that are tailored to your interests. These third parties include advertisers, advertising agencies and ad networks that may collect information about you when you view or interact with one of their advertisements and may collect information about your online activities over time and across different websites.

Third parties that may serve, track and/or analyze ads on our Services, and thereby may collect information on such Services about your online activities for the purpose of delivering tailored ads to you include, but are not limited to, [A9](#), [Admob](#), [Criteo](#), [Google/DFP](#), [Jivox](#), [LiveRail](#), [Mixpo](#), [PointRoll](#), [Sizmek](#), [Yieldbot](#) and [YieldMo](#). CBS Local does not have access to the information these third parties may collect about your interests to deliver relevant advertising to you, and the information practices of these third parties are not covered by this Privacy Policy. These companies may offer a way for you to choose not to have your information used for advertising purposes. You can find more information by clicking on the company names above and following the links to each company's website.

In addition, some of these companies are members of the [Network Advertising Initiative \("NAI"\)](#), which offers a single location for consumers to opt out of receiving tailored advertisements from member companies. To learn more and opt out of information collection by

NAI member companies, please visit the [NAI Consumer Opt-Out](#) page. Also, through the Digital Advertising Alliance ("DAA"), several media and marketing associations have developed an industry self-regulatory program to give consumers a better understanding of and greater control over advertisements that are delivered based on their online behavior across different CBS Local Services. CBS Local is committed to complying with the DAA's Self-Regulatory Program for Online Behavioral Advertising. To learn more and make choices about interest-based advertisements from participating third parties, please visit the [DAA Consumer Opt-Out](#) page.

In addition, CBS Local works with third parties to help us track the advertisements that are delivered to you; in particular, to control the number of times you receive the same advertisement and to analyze the effectiveness of advertising on the CBS Local Services. Third parties that use cookies, web beacons and other similar technologies to help us with traffic measurement, research and analytics include [Adobe Analytics](#), [Google Analytics](#), [comScore](#), [ConfirmIT](#), [Moat](#) and [Nielsen](#). We do not share your contact information with these third parties.

If you opt out of having your information used to deliver advertisements tailored to your interests, you will continue to see advertisements on our Services, but these advertisements may not be as relevant to you.

For more information about relevant advertisements delivered by CBS Local, please read the [CBS Local Online Advertising](#) section of this Privacy Policy.

Video Services and Social Networking Policy

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Your video content viewing activities may be collected through your use of the CBS Local Services. By viewing our video content, you are consenting to share your video activities with others, including what videos you have watched on the Services. Sharing this information will allow you to take advantage of social networking and other features on the Services.

Social Networking Services

CBS Local has partnered with certain third party social networking companies to offer you their services through certain CBS Local Services. For example, you can use third party social networking services such as [Facebook](#), [Google+](#) or [Twitter](#) to share information about your experience on our Services with your friends and followers on those services. These social networking services may be able to collect information about you, including your activities on a CBS Local Service, and they also may notify your friends, both on CBS Local Services and on their services, that you are a CBS Local user or about your use of the CBS Local Services, in accordance with applicable law and their own privacy policies.

By using your CBS Local Services account with a third party social networking service, you consent to share information about you, including video content that you have watched on CBS Local Services, with your friends and followers on those services. You can limit how third party social networking services share your information by visiting your social networking services' websites and updating your privacy settings.

In addition, CBS Local Services may request your permission to a) access and collect information available from your social networking account; and b) post information to your friends on your behalf. When you connect your social networking service with your CBS Local Services account, you authorize CBS Local Services to access certain information about you from your social networking service to provide content and services, including to help us tailor our communications to you and develop rich online content and services across the CBS Local Services. The information CBS Local may access from your social networking services is governed by the privacy policies and settings of those third party services.

Video Measurement Services

Some of the CBS Local Services may use [cookies](#), [web beacons](#) and [other similar technologies](#) that allow market research companies such as Nielsen or comScore to collect information about you, including video content that you have watched on the CBS Local Services. By watching video content on CBS Local Services, you consent to allow us to share information about you with these video measurement services. For more information about Nielsen, please [click here](#). If you do not wish to participate in Nielsen's digital measurement research on mobile platforms, please [click here](#) to opt out. If you choose to opt out, CBS will not share with Nielsen video content viewing information about you. For more information about comScore, [click here](#). Please note that we do not share contact information with video measurement services.

In addition, third party market research services such as Nielsen may access information about you through your social networking services. You can limit the information that such companies may access by visiting your social networking service and updating your privacy settings. [Click here](#) to read about Facebook's participation in Nielsen's measurement services, and [here](#) to learn how to opt out of Nielsen measurement services on web browsers.

CBS Local FCC Requirements

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If you send a written communication (including an email) regarding the programming or operation of a CBS radio or television station, your communication may be placed in the public inspection file of that station or made available via electronic file access at the station. In either case, your communication may be subject to review by members of the general public, as required by Federal Communications Commission ("FCC") regulations. Be advised that we are not responsible for information that may be disclosed if your communication is made available for review by members of the general public in compliance with FCC regulations.

California Visitors

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Residents of the State of California may request a list of all third parties to which the CBS Local Services has disclosed certain information during the preceding year for the third parties' direct marketing purposes. If you are a California resident and would like such a list, please contact us at <http://policies.cbslocal.com/privacy/generalinfo.html>. If you are a California resident under 18 years of age, and a registered user of any website where this policy is posted, you may request removal of content or information you have publicly posted. Please be aware that such a request does not ensure complete or comprehensive removal of the content or information you posted and there may be circumstances in which the law does not require or allow removal, even if requested.

For all requests, you must put the statement "Your California Privacy Rights" in the subject field of your request and include the name of the CBS Local Service with respect to which you are requesting the information. You must also include your full name, street address, city, state, and zip code. We will not accept requests via telephone, postal mail, or facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

CBS Local Children's Privacy Policy

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CBS Local Services recognize the need to provide additional privacy protections when children visit the websites on which this CBS Local Children's Privacy Policy is posted. The following guidelines supplement our general [Privacy Policy](#) and follow the rules set by the U.S. Children's Online Privacy Protection Act (COPPA) and other applicable laws. When we use the term "child" or "children" below, we mean an individual under 13 years of age or an individual under 18 years of age where the collection, use, or disclosure of personal information about such an individual is restricted by applicable law. When we use the term "parent" below, we mean to include legal guardians.

Information We Collect

Children can enjoy content and features on CBS Local Services without directly providing contact information. However, children who wish to participate in sweepstakes, contests, and certain other special activities may need to provide information such as first name, user name, password, email address, date of birth, city and state of residence, and gender.

In the course of participating in interactive features such as chat rooms and message boards, a child may provide us with additional information about himself or herself, such as the contents of his or her postings. Some information, including information collected through [cookies](#), [web beacons](#) and [other similar technologies](#) may be collected automatically. For more information, see the ["Information we collect automatically on CBS Local Services"](#) section of our general privacy policy.

If we knowingly collect, use or disclose contact information collected from a child, we will provide you notice and obtain parental consent in accordance with applicable law.

We do not condition a child's participation in an online activity on the child's providing more contact information than is reasonably necessary to participate in that activity.

Use of Information

We use the information we collect consistent with the services requested by the child. For example, we may use information provided by the child to:

- Send a newsletter, electronic card, and other communication requested by the child;
- Enable a child's participation in certain interactive features such as games, contests, message boards, chat rooms, song requests, and online scrolling tickers; and
- Respond to correspondence sent by the child.

We may also use a parent's contact information to communicate with the parent regarding the child's activities on CBS Local Services. For example, if a child wins a sweepstakes or contest, we may use the parent's contact information to conduct prize fulfillment.

Disclosure of Information Collected

Information collected from children will be disclosed in the same ways described in the [Disclosure of Information Collected](#) section of our general Privacy Policy. Third parties who receive contact information collected by CBS Local have agreed to maintain the confidentiality, security and integrity of that information. Parents have the option not to consent to the disclosure of their child's contact information to third parties. Parents may also consent to CBS Local's collection and use of their child's contact information while refusing to permit the disclosure of that information to third parties.

Parents' Choices and Access to Children's Information

Parents may review the contact information we have collected from their child, refuse to permit us to collect further contact information from their child, and request that any contact information we have collected be deleted from our records.

To review, update or delete your child's contact information, please [contact us](#). You may also send your request to the postal address listed below. To protect your child's safety, we ask for proof of your identity. We may deny access if we believe there is a question about your identity.

Please note that certain information cannot be deleted because of other legal obligations, such as [FCC requirements](#).

Changes to the CBS Local Children's Privacy Policy

We may amend the CBS Local Children's Privacy Policy at any time and will make material changes only in conformance with applicable law. We will provide parents with notice of any material changes in the way we intend to collect, use, and share children's contact information. Accordingly, parents should update their contact information to provide us with current email addresses at all times.

Contact Us

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If you need further assistance, please [contact us](#). If you would prefer to submit your questions or comments by postal mail, please send a letter to the following address:

CBS Local Digital Media
1700 Broadway, 7th Floor
New York, NY 10019
Attn: General Counsel

CBS Local Digital Media Privacy Policy FAQ

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We have updated our Privacy Policy to provide visitors of CBS Local Services with a single, uniform policy consistent with our core [Privacy Principles](#). Here, you will find answers to some common questions about our new Privacy Policy. To review the current Privacy Policy, [click here](#).

Why are you updating your Privacy Policy?

As CBS Local expands and the laws protecting individual privacy evolve, we update our Privacy Policy accordingly to ensure that we are adhering to all applicable laws and conform to a consistent set of core [Privacy Principles](#) followed by our companies

Have you made any substantively material changes to the Privacy Policy?

No, we have not made any substantively material changes to our Privacy Policy.

What are the "core" privacy principles that CBS Local follows?

Trust is a cornerstone of our mission at CBS Local. We are committed to gaining and maintaining your trust by following five key principles: transparency, choice, access, security, and accountability. For more information, [click here](#).

Will you share my contact information with third parties?

Like other businesses, we share contact information (such as name and email address) with vendors who process credit card transactions, with business partners who co-sponsor CBS Local Services, and when we have consent from our users. For more information, [click here](#).

Can you give me an example when you will share my information with third parties?

If you enter a sweepstakes that is jointly sponsored by a third party, we may share your contact information with that third party. Also, if you seek to download a free song from a band or listen to a free stream of a band, we might ask you to consent to have your contact information shared with third parties who may contact you about information concerning that band's appearances. This allows us to offer you valuable content for free.

Does CBS Local allow third parties to collect and use data about me for online advertising?

Our advertisers may have relationships with third parties who deliver their advertisements on our Services. While delivering these advertisements, these third parties may collect and use information about your activities on our Services (such as the content you viewed). These companies may offer you a way to choose not to have your information used for advertising purposes. To learn more, [click here](#).

Does CBS Local share contact information with other websites or services owned by CBS Corporation?

As CBS Corporation continues to expand its online offerings, we will share information with other websites owned by our parent, CBS Corporation, so that we can inform our users better about products and services in which they may be interested. It is up to you to decide whether you want to hear about special offers from us or from other business units owned by CBS Corporation. You can choose not to receive such marketing emails when you register with us, by updating your preferences, by clicking on the "Unsubscribe" link in any email we send, or by contacting us localcontactus@cbs.com.

Do you use my data for advertising on CBS Local Services?

Like other websites, we are able to offer free content and services through the revenue we receive from advertising on CBS Local Services. We hope you value the advertising you see on our Services, and we may use some data about you to tailor advertisements to your apparent interests. For example, if you visit the CBS Local Services and read articles about computers, we may serve you with a computer-related

advertisement when you visit another CBS Local Service. This advertising does not result in you seeing more advertisements; rather, it just means you'll see more relevant advertisements. To learn more, [click here](#).

What are the benefits to me of the new Privacy Policy?

We hope you will find our Privacy Policy easier to read and understand across all CBS Local Services. We are committed to gaining and maintaining your trust. If you have any questions about our Privacy Policy, please [contact us](#).

[Terms of Use](#) | [Privacy Policy](#)

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EXHIBIT 70



LAST MODIFIED: MAY 25, 2018

Policy on Cookies, Web Beacons, Pixels, and Similar Technologies

Our AccuWeather Sites use technologies such as Cookies, Pixel Tags, Web Beacons, Flash Shared Objects, HTML local storage or HTML mini databases to help improve your experience. These AccuWeather Sites include our websites, mobile applications and other digital products.

These technologies are small data files that are placed on your device. The names and types of these technologies change from time to time. In this policy, we may refer to the specific names or we may simply use the term "cookies" to describe them.

Cookies serve a number of purposes. We use them:

- to provide you a better, faster and safer experience
- to help us find out what parts of the site your device last visited, so we can deliver content that is most relevant to you
- to provide advertising, which enables us to provide many of our AccuWeather Sites free of charge or at low rates
- to analyze and optimize the performance of our AccuWeather Sites

Below are examples of some commonly used cookie technologies.

- **Cookies** are files with small amounts of data, which may include an anonymous unique identifier. If you are accessing an AccuWeather Site through a browser, including a browser on a mobile device, cookies may be sent to the browser and stored in the device's memory. This identifies the device the next time it accesses an AccuWeather Site through a browser.
- **Pixel Tags, Web Beacons, Flash Shared Objects/HTML5 Local Storage/HTML5 Mini Databases.** Many mobile devices use these technologies which allow for the storage of information on the mobile devices and, in effect, allow the enhancement of internet browsing. Flash Shared Objects, HTML5 Local Storage and HTML5 Mini Databases also allow the device to track a user's web browsing movements across the internet and not just on one particular website.

Some cookies are "first party cookies" that come directly from us. Some cookies are "third party cookies" that come from third-party providers who help us operate our AccuWeather Sites, who serve advertisements to your device when you use AccuWeather Sites. Some third-party cookies also may come from third-party providers whose content is embedded in an AccuWeather Site or accessed through an AccuWeather Site.



Florence-Graham, CA 53° F



Search

when you return because we may not recognize the device. For example, if we do not recognize a device, we may require you to re-enter a location you have saved for convenience or re-enter a password.

You also can opt out of receiving cookies by visiting <https://www.aboutads.info/choices> or https://networkadvertising.org/managing/opt_out.asp or <https://choice.live.com/AdvertisementChoice> or <https://youronlinechoices.eu/>.

For more on other information we collect and store, see our [Privacy Policy](#).

COMPANY



PRODUCTS & SERVICES



APPS & DOWNLOADS



SUBSCRIPTION SERVICES



MORE



Social Icon



Social Icon



Social Icon



Social Icon

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EXHIBIT 71

[WEDDING REGISTRY](#)[FREE DESIGN SERVICES](#)[TRADE PROGRAM](#)[INSPIRATION](#)[COLLABORATIONS](#)[EASTER](#)

[Furniture](#)
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[&kids](#)

**ALL BE NEW MARKDOWNS** Up to 60% off →self →[Home](#) > [Customer Service](#) > [Privacy Policy](#)

Privacy Policy

FREQUENTLY ASKED

+

PRODUCT INFORMATION

+

SHIPPING QUOTE FORMS AND INQUIRIES

+

PREFERENCES AND PRIVACY POLICIES

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Privacy Policy

[Email Preferences/Opt Out](#)[Catalog Preferences](#)[Selling/Sharing Preferences](#)[Gift Card Authenticity](#)[Thank You Manager Terms and Conditions](#)

CHAT

Effective January 6, 2022

By sharing the Privacy Policy for Crate and Barrel and CB2 collectively, the “Company”, “we” or “us”), we hope to help you understand how information can create new opportunities for you, our customer, as well as to reassure you that we respect and honor customer requests to restrict and protect personal information. If you reside in California, please see [Notice to California Residents/Your California Privacy Rights](#). If you reside in Nevada, please see [Notice to Nevada Residents/Your Nevada Privacy Rights](#). If you reside in the EU, please see [Notice to EU Residents](#). These sections provide information regarding the rights afforded to individuals residing in these jurisdictions under applicable law. We will comply with our [Canadian Privacy Policy](#) with respect to Canadian residents.

Information We Collect

Information you provide to us:

When you use our services:

When you make a purchase in one of our stores or on [crateandbarrel.com](#), [cb2.com](#) or our mobile apps (collectively, “Websites”) or otherwise, create an account, join our Gift Registry, participate in a sweepstakes, contest or any other promotion, post a product review, engage with us on our social media platforms, apply for our credit card, participate in one of our surveys, send us any feedback, questions, comments, suggestions, ideas, or interact with us in any way, you provide us with personal information, such as: your name, email address, mailing address, ZIP code, phone number and credit card numbers. This allows us to provide you with our online and in-store retail and design services, process your transactions more efficiently, offer you promotions, contests and other opportunities and, ultimately, give you a higher caliber of customer service (together the “Services”). If you choose not to provide the requested information we may not be able to provide you with the Services, or certain features of the Services may not be functional.

When you apply for a job:

Our Site includes a Careers feature that allows you to submit an online job application if you reside in the US or Canada. When you submit an online application, you will be required to provide personal information, including but not limited to your name, contact information, job interests, educational and job history, and references. This information will be used by us to assess and process your application. You will be provided with more information about how we process this information as part of the application process.

You will also be asked to provide equal opportunities information. This is not mandatory – if you don’t provide it, it won’t affect your application. We won’t make the information available to any staff outside our recruitment team, including hiring managers and any relevant support staff, in a way that can identify you. Any information you provide will be used to produce and monitor equal opportunities statistics.

The online application process is hosted and supported by a third-party service provider, iCIMS. iCIMS receives and stores the information you provide. iCIMS does not disclose the personal information it receives and maintains for us to anyone else. Click [here](#) to see the iCIMS privacy policy.

If we decide to interview you, we may print your application and use it during the interview process. If you are hired, your application becomes part of your employee file. If you are not immediately hired, your printed application is kept for two years and then typically will be destroyed. We may ask you to provide additional information during the interview or hiring process. We may also use the information you provide to contact you about your application; for example, to ask you to agree to a background check or to send you an offer letter.

We do not share the information you provide in the online application to anyone outside of the Company and iCIMS, except as we believe is required by law.

Information About You We Receive from Third Party Vendors:

Other companies we do business with may provide to us additional personal information (such as, for example, names, mailing addresses and email addresses, as well as demographic and other usage information), when we have news or product offerings that may be of interest to those individuals. This does not apply to you if you reside in the EU.

Usage and Website Activity Information:

When you visit our Websites, we or our third-party service providers collect information about your use of the Websites: your Internet service provider’s address, your location as determined by your Internet Protocol (“IP”) address, the name of the website or advertisement directing you, your user agent, as well as your clicks and activity on our Websites. We use this information to understand how to make our Websites more available and user-friendly to our customers, as well as to provide you with advertising that may be of interest to you. This is described in [more detail here](#). To learn how you can opt out of such advertising click [here](#). We do not serve interest-based advertising to users we identify as using our websites from EU IP addresses.

Analytics Tools:

We use tools to collect some information we listed above in the section called, “Usage and Website Activity Information” about your use of the Services. For example, we use the information we get from Google Analytics and Adobe Analytics to improve the Services. In order to collect this information, Google Analytics and Adobe Analytics may set cookies on your browser or mobile device, or read cookies that are already there. Google Analytics and Adobe Analytics may also receive information about you from apps you have downloaded, that partner with Google or Adobe, respectively. We do not combine the



CHAT

Screen reader users: Please switch to forms mode for this link.

[feedback](#)

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information collected through the use of Google Analytics or Adobe Analytics with personally identifiable information.

Google's ability to use information collected by Google Analytics about your visits to the services and share it with another application which partners with Google is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. Please review those and see <http://www.google.com/policies/privacy/partners/> for information about how Google uses the information provided to Google Analytics and how you can control the information provided to Google. To prevent your data from being used by Google Analytics, you can download the Google Analytics opt-out browser add-on for Google Analytics, which [can be found here](#).

Adobe's ability to use information collected by Adobe Analytics about your visits to the services and share it with another application which partners with Adobe, is restricted by the Adobe Analytics Terms of Use and the Adobe Privacy Policy. Please review those and see <https://www.adobe.com/privacy/marketing-cloud.html> for information about how Adobe uses the information provided to Adobe Analytics and how you can control the information provided to Adobe. To prevent your data from being used by Adobe Analytics, you can download the Adobe Analytics opt-out browser add-on for Adobe Analytics, which can be found [here](#).

The Google Analytics and Adobe Analytics products we use collect only anonymized IP addresses for IP's located in the EU.

In-Store Information:

In some of our US store locations, if you choose to use our Wi-Fi technology, we may track location analytics. This data is used to improve store layout and enhance customer shopping experience in our stores. To collect the data, we allow a third party provider to use a technology that senses the presence of smartphones. Certain device information, like device ID and location, is collected. Additional personal information is only collected if you consent to that collection. To learn more about customer location and your choices from our service providers, visit www.smart-places.org.

We use cameras in our stores for security and loss prevention purposes. We temporarily store security camera footage, but we do not store recordings in a way that connects them to particular customers. We also use technology to track store traffic, though this technology does not store images or personally identify shoppers.

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Social Media

We engage with customers on various social media platforms like Facebook, Twitter, Pinterest and Instagram. If you contact us on one of these platforms for customer service or otherwise, we may reply to your post or comment and/or contact you via direct message. Those communications are governed by this policy as well as the policy of the relevant social media platform.

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Cookies and Other Tracking Technologies

"Cookies" are small amounts of data that are stored on your computer. When you visit one of our Websites, it sends a cookie or cookies to your computer, which your computer stores in a file in your web browser. Cookies flag information about your activity on our Websites. This information helps us improve our Websites and make them friendlier and easier to use and allows us to market to you more effectively. We never use cookies to save passwords, credit card numbers or other highly confidential information. However, we use them and other tracking technologies to provide enhanced online marketing based on your interests and preferences. To learn about how to opt out of our cookies used for these personalized online ads, [please click here](#).

Web cookies are used in some email messages and on our Websites to help us measure the effectiveness of those emails and for other analytical purposes. To learn how to opt out of our cookies used for these purposes [click here](#).

We also contract with a service provider to help us assess visitation to our Websites. To do this, we place small pixel tags and cookies on our Websites. While these do allow our service provider to track your visits, the data retrieved cannot be used by the service provider for any reason without our authorization. Although our service provider logs the information about your visit, we control how that data may and may not be used. We may track this information across the different devices you use to access the Websites. You can opt out of this analysis tool by clicking <https://metrics.crateandbarrel.com/optout.html>.

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How We Use Your Information

We use the information we collect about you to facilitate your purchases, to communicate with you, to offer better customer service, and to improve our services and customer relations.



to make improvements to our Websites or user interface through understanding how you interact with them, including how you interact with advertising. [See usage and website information section above.](#) **The analytics and advertising products that we use collect anonymized IP addresses from EU locations.** We use information you provide to us through your purchases, feedback, surveys, and suggestions to enable us to provide you with a more personalized shopping experience and also to improve our services and customer relations.

In connection with your account: In order to provide full transparency into your account history, there are certain scenarios in which orders you place while not logged into your online account will be visible in your account order history. In particular, online orders placed as a guest, orders placed with the call center, and orders placed in store will be visible in your online account order history if an email address provided during the transaction matches the email address associated with the online account, or if you paid using a credit card that is a saved payment method in the online account.

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How we share your information

Facilitating International Purchases: For orders outside the US and Canada, visitors must complete an International Quote Form. We may share the information that you provide in that form to our third party service providers that assist us with shipping and delivery.

Marketing: We share your customer information with other select companies whose products and services you may find useful. This information includes your name, postal address and email address, as well as a record of any transactions you conduct on our Websites or offline (for example, in our stores or via customer service). These companies may contact you in order to provide you with information about their products and services. To learn how to opt out of this sharing of your information [please click here](#). We do not share information of users of our Websites that provide an EU mailing address or are identified as being from EU locations.

Online Advertising: We contract with companies that offer advertising services to place our banner advertising on other websites. These companies collect information from us about your visits to our Websites and stores, and your interaction with our products and services. They also use this information to tailor banner advertisements for goods and services when you visit certain websites. We may track this information across the different devices you use to access the Websites. These companies are required to keep this data anonymous and not to share any personal information with any other third parties, except as required to provide this service. **These companies do not collect EU IP addresses for the purpose of advertising and we do not place banner advertising on other websites for customers identified as being from EU locations.**

Sharing among our entities: We share and combine information about you among our brands, such as Crate & Barrel, CB2, Crate and Kids and Hudson Grace, in order to provide greater security and to provide information about products and services that might interest you. We also share your information with our parent company, subsidiaries, joint ventures, or other companies under common control as necessary for specific purposes in the operation of our business.

We share and combine information about our US-based customers of products and services that may interest them. You can learn how to opt out of promotional emails from our entities, [as explained here](#).

Sharing with vendors: In order to serve you better, we may, at times, contract with other companies to help us process information and to provide us with other services. Their assistance can help us fulfill customer orders, manage, store, and enhance customer data, send marketing, run promotions, and provide other services. For instance, when you order a large furniture item, we may send your name, address, email address and phone number to our shipping allowing you to access their online delivery scheduling system. Our shipping service providers use your information strictly to coordinate and complete shipment.



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Your Information Sharing Choices

Marketing: If you do not want us to share your personal information for marketing purposes, [please contact us](#) and we will remove your name from lists we share with other companies. When contacting us, please clearly state your request, including your name, mailing address, email address, and phone number. After we process your request, your personal information will no longer be shared for marketing purposes. Opting out of sharing your information for marketing purposes will not prevent your relevant information from being provided to our service providers as needed to provide Services to you, such as shippers when you order products for delivery. Similarly, this will not prevent us from sharing information to the extent it is de-identified or aggregated (in a non-personally identified manner).

Online advertising: To opt out of interest based advertising or to learn more about the use of this information by our Service Providers you can visit the [Network Advertising Initiative](#) or the [Digital Advertising Alliance](#). If you choose to opt out, we will place an "opt-out cookie" on your computer. The "opt-out cookie" is browser specific and device specific and only lasts until cookies are cleared from your browser or device. The opt-out cookie will not work for some cookies that are important to how our websites and mobile apps work ("essential cookies"). If the cookie is removed or deleted, if you upgrade your browser or if you visit us from a different computer, you will need to return to the links above to re-select your preferences.

Mobile app communications: You can deactivate push notifications in our mobile apps at any time by changing the notification settings on your mobile device.

Email promotional communications: To delete your name from our email contact lists, please follow these [email opt-out instructions](#). Please note that, to provide you with more control of your experience with us, opting out of one brand does not automatically opt you out of our other brands. For example, if you click through to opt out of emails from CB2, you will not be opted out of emails from Crate and Barrel. It may take 7-10 days for email opt-outs to fully process and take effect.

Catalog: To request to have your name removed from the catalog mailing list, please complete this [catalog opt-out form](#). We appreciate your patience while we process your request. When you make subsequent purchases at Crate and Barrel or CB2, you may provide contact information for customer service and request that your name not be forwarded to either mailing list. If you have already opted out, you do not need to opt out again; your information will be used for purposes other than the customer service you have requested, unless you affirmatively ask to opt in again, in which case you will be opted in and will



Right to Know

You have the right to request that we disclose what personal information we collect, use, disclose, and sell. You can submit a verifiable request to know either the categories of information or specific pieces of information that we have about you by submitting this [online request form](#). You will be directed to enter your name, email address, zip code, and phone number. If we have a matching email address on file, we will send a link, which you will have to click to begin the identity verification process. We will then compare your zip code and phone number against our records. If we cannot verify your identity, you will receive an email explaining that your identity could not be verified and directing you to a customer service representative. Alternatively, you can verify your identity over the phone by calling (877) 401-0734 rather than using the online form.

You may use an authorized agent to submit a right to know request. To use an authorized agent, you must provide the agent with written authorization. In addition, you may be required to verify your own identity with us. We may deny a request from an agent if the agent does not submit proof that they have been authorized by you on your behalf. Such requirements, however, will not apply where you have provided the agent with power of attorney pursuant to California Code Sections 4000 to 4465.











EXHIBIT 72

https://www.wellsfargo.com/privacy-security/privacy/online Go JUL AUG SEP 04 2019 2020 2021 About this capture

1,353 captures
5 Apr 2014 - 22 Feb 2022

WELLS FARGO Sign On Customer Service ATMs/Locations Español Search

Personal Small Business Commercial Financial Education About Wells Fargo

Banking and Credit Cards Loans and Credit Investing and Retirement Wealth Management Rewards and Benefits

Personal > Privacy, Security, and Legal > Privacy Policies and Notices > Wells Fargo Digital Privacy and Cookies Policy

Wells Fargo Digital Privacy and Cookies Policy

Print Share

Date of most recent update: January 1, 2020

Introduction and scope of policy

This Wells Fargo Digital Privacy and Cookies Policy ("Policy") applies to your interaction with Wells Fargo & Company or any of its subsidiaries (collectively, "Wells Fargo," "we," "us," "our"), at any online or mobile site or application that we own and control ("Site"), unless a different online and/or mobile or other privacy policy is posted at a particular site, or is made available to you and by its terms supplants this Policy. Other privacy policies may also apply in addition to the terms of this Policy.

Additional privacy policies and notices

Certain additional Wells Fargo privacy-related policies and notices that may apply are posted on the [Privacy Policy Index](#). These notices include the [Wells Fargo California Consumer Privacy Act Notice \("CCPA Notice"\)](#), available at www.wellsfargo.com/privacy-security/privacy/california-consumer-privacy-notice. The CCPA Notice explains how we collect, use, and disclose personal information about California residents and how California residents can exercise rights under the CCPA.

The additional policies and notices also include the [Wells Fargo U.S. Consumer Privacy Notice](#), which applies to U.S. customers and consumers as described in that notice and various international privacy policies, which apply to information collected by us outside of the U.S. as described in those policies. You may also receive an additional privacy notice in connection with your use of a particular product or relationship with a specific business. For example, Trust or fiduciary accounts for which Wells Fargo is the trustee or service provider, including employer-sponsored retirement accounts, are protected under special rules of confidentiality. Information on these accounts is not shared for marketing purposes without specific consent. This Policy also explains certain data use and data protection functionalities and practices of our online ads, such as banner ads, on third party sites. Please note that where we have another type of presence on a site owned by a third party, such as a page or handle on a social media site, that third party's privacy policy and terms of use, rather than this Policy, will govern, unless specifically stated otherwise.

Agreement to policy

By using a Site or interacting with a Wells Fargo advertisement or page or account on a third party site, you consent to this Policy, including your consent to our use and disclosure of information about you in the manner described in this Policy.

Gathering, using, and sharing information

[Types of information](#) | [About "cookies" and Ad Choices on third party sites](#) | [Do you have to accept cookies?](#) | [Additional cookies](#) | [Additional technologies](#) | [Using information](#) | [Sharing](#)

Types of information

You may interact with us in a variety of ways online, including through a mobile device. We may offer sites or applications that permit browsing and do not require registration. We may also offer the ability to enroll, register or access your accounts online. Information that we may collect about you through online interaction includes information that you input, such as your name, address, email address, other contact information; data resulting from your activity, such as transaction information; location information; and biometric information, such as voiceprint, for example, if you choose to enroll in verification by voiceprint. We may also gather additional information, such as the type of device and browser you are using, the IP address of your device, information about your device's operating system, and additional information associated with your device. We may also gather information collected through cookies, tags, and other technologies, as described further below.

About "cookies" and Ad Choices on third party sites

Cookies are pieces of data stored on your device. Browser cookies are assigned by a web server to the browser on your device. When you return to a site you have visited before, your browser gives this data back to the server. Mobile applications may also use cookies.

We use cookies and information gathered through their use to make your experience with Wells Fargo and certain other sites richer and more personalized based on the products, services, or other interaction you have with us and other sites. Information gathered through use of cookies may be used to make offers to you via online ads, email, U.S. mail, or telephone, subject to the privacy preferences you have on file with Wells Fargo. (Privacy preferences for employer-sponsored retirement accounts default to no marketing, solicitation or sharing for marketing purposes without specific consent.) We also use cookies, sometimes in conjunction with service providers, in online advertising either on our own Site or on third party sites to help determine which of our advertisements are most likely to appeal to you. We respect consumers' ability to exercise choice in receiving these types of ads on third party sites. We honor your choice as follows: For this type of advertising placed on third party sites, we participate in the program utilizing the Advertising Options Icon. If you receive an ad delivered on a third party site in part based on information gathered through the use of cookies, you may opt out of receiving such ads by clicking the displayed icon and following the instructions or by visiting <http://www.aboutads.info/choices/>. This opt-out works via cookies set on a particular

browser, so if you delete cookies from a web browser, you will need to opt out again on that web browser.

If you use multiple browsers or devices, information that we collect about you from one particular browser or device may be used to provide advertising or collect information on another browser or device. Information may also be transferred to a third party for advertising or information collection on behalf of Wells Fargo. Please note that your choice to opt out on a particular browser or device will apply only to the collection and use of information from that particular browser or device. Opting out on a particular device will not opt you out of information collection on other devices, nor will it limit cross device sharing on those other devices. If you use different browsers on a device or multiple devices, for each browser and device you wish to opt out, please opt out each device and browser separately at <http://www.aboutads.info/choices>.

Industry standards are currently evolving and we may not separately respond to or take any action with respect to a "do not track" configuration set in your internet browser.

Other parties that may collect information about your web browsing behavior when you use our Site are generally limited to service providers who may only use any information collected to provide services and marketing for us and not to provide services or advertising for any other party. Note, however, that we also provide certain widgets or tools on our sites that allow you to interact with third parties who provide these features, such as tools that allow web surfers to easily share information on another platform, such as a social media platform. At other times, information from a third party may be embedded on our Site, such as a map. These widgets, tools, and informational items often function through the use of third party cookies utilized by the third party site, such as the social media platform. As a result, these third parties may have access to information about your web browsing on the pages of our Site where these widgets, tools, or information are placed. You may wish to review information at third party sites, such as social media platforms where you have an account, to determine how these third parties treat data that they obtain through the use of cookies.

We also use cookies for purposes such as maintaining continuity during an online session; gathering data about the use of our Site; monitoring online promotions; and anti-fraud and information security purposes.

Do you have to accept cookies?

You may be able to set your browser to reject browser cookies. However, if you choose to reject cookies, you cannot access your accounts online with Wells Fargo. Therefore, if you set your browser options to disallow cookies, you will limit the functionality we can provide when you visit our Site. The latest versions of internet browsers provide cookie management tools, such as the ability to delete or reject cookies. We recommend that you refer to information supplied by browser providers for more specific information, including how to use these tools.

Additional cookies

Cookies is a term also used to describe other locally stored objects, such as cookies stored in an Adobe folder on your device. These cookies will not be deleted when you clear cookies from your browser. We may use this technology for purposes such as information security and fraud prevention. We do not use this technology for online behavioral advertising purposes. Please refer to information provided by Adobe for information on how to disable and control Flash objects. If you choose those options, you may limit the functionality we can provide when you visit our Site.

Additional technologies

We may also use additional technologies such as pixel tags, web beacons, and clear GIFs, and may permit our third party service providers to use these technologies. We use these technologies for purposes such as measuring the effectiveness of our advertisements or other communications, determining viewing and response rates, and determining which offers to present to you on our own or on third party sites.

Using information

In addition to the uses described above, we use information for purposes as allowed by law such as: servicing; communicating with you; improving our Site, products, or services; legal compliance; risk control; information security; anti-fraud purposes; marketing or personalizing the presentation of our products and services to you; tracking website usage, such as number of hits, pages visited, and the length of user sessions in order to evaluate the usefulness of our sites; and using read-receipt notifications in our email communications.

Sharing

We may share information with service providers with whom we work, such as data processors and companies that help us market products and services to you. When permitted or required by law, we may share information with additional third parties for purposes including response to legal process. As applicable, please see the additional privacy policies referenced above, such as the [Wells Fargo U.S. Consumer Privacy Notice](#), for more information on how we may share information with affiliates and third parties.

Children's privacy

Our Sites are not directed to children under the age of 13, and they do not knowingly collect personal information from such children.

Policy updates and effective date

If we make updates to this Policy, we will update the Policy with the changes and revise the "date of most recent update" posted at the top of this Policy. Any updates to the Policy become effective when we post the updates on the Site. Your use of the Site following the update to the Policy means that you accept the updated Policy.

LRC-1119

EXHIBIT 73

Privacy Policy



The New York Times Company Privacy Policy

Last Updated on January 29, 2021

At The Times, our mission is to seek the truth and help people understand the world. We want you to understand how we handle your data. We also want you to know your rights and choices.

1. [What Information Do We Gather About You?](#)
2. [What Do We Do With The Information We Collect About You?](#)
3. [With Whom Do We Share the Information We Gather?](#)
4. [What Are Your Rights?](#)
5. [What About Sensitive Personal Information?](#)
6. [How Long Do You Retain Data?](#)
7. [How Do You Protect My Information?](#)
8. [Are There Guidelines for Children?](#)
9. [How Is Information Transferred Internationally?](#)
10. [What Is Our Legal Basis?](#)
11. [What About Links to Third-Party Services?](#)
12. [How Are Changes to This Privacy Policy Communicated?](#)
13. [How Can You Contact Us? Who Is the Controller of Your Personal Information?](#)

This policy describes how we handle your data when you use "Times Services," listed below:

- The New York Times newspaper, plus our International Edition
- Our websites, like *nytimes.com*
- Our apps, like the *New York Times app* and the *New York Times Crossword app*
- Our email newsletters, like *Cooking and Morning Briefing*
- Our pages or ads on social media networks, like our *Facebook and Instagram* pages
- Anywhere we gather information from you and refer you to this Privacy Policy

How we handle information about you depends on which Times Services you use — and how you use them. We use different information about print subscribers than website visitors.

Be aware that certain Times Services work differently. Some have additional terms that supplement this policy (e.g., [Reader Submissions](#)). Others refer to a different privacy policy altogether, so this one does not apply.

1. What Information Do We Gather About You?

The information we gather about you depends on the context. By and large, it's information about you that can personally identify you — either on its own or when combined with other information.

The following describes the information we collect and how we obtain it.

A) Information Collected Through Times Services.

i. Information You Voluntarily Give Us

• For Registration:

When you sign up for a Times Service (e.g., a *subscription*), we collect your contact information and account credentials. Once you're registered, we assign you a unique ID number. This ID number helps us recognize you when you're signed in.

Exhibit
GO- 0007
7/5/2021
Claudia Kindler - V1

- **For Registration:**

When you sign up for a Times Service (e.g., a subscription), we collect your contact information and account credentials. Once you're registered, we assign you a unique ID number. This ID number helps us recognize you when you're signed in.

For some Times Services, you can instead sign up by linking your Apple, Facebook or Google account. See "[From Other Sources](#)" below.

If you register for an event or conference, we might ask for additional information (e.g., your company name, your job title or your dietary restrictions).

- **For Billing:**

To process payments or donations, we collect and use your payment information.

This can include your name, your address, your telephone number, your email address, your credit or debit card information and any other relevant information.

- **For User-Generated Content:**

We offer you the ability to post content that other users can read (e.g., comments or recipe reviews). Anyone can read, collect and use any personal information that accompanies your posts. See the [Comments F.A.Q.](#), or read "[User-Generated Content](#)" in our Terms of Service for more information.

We do not have to publish any of your content. If the law requires us to take down, remove or edit your personal information, we will comply to the required extent.

- **For Contests, Sweepstakes and Special Offers:**

When you sign up for these, you give us your name, email and any other required information.

- **For Reader Surveys, Research, Panels and Experience Programs:**

We gather information through questionnaires, surveys and feedback programs. We also conduct similar research for advertisers. We ask you for your consent to use this information when you participate in these programs and events.

- **During Contact With Our Call Centers:**

We collect information from you when you place an order over the phone or contact customer service through one of our toll-free numbers.

- **Personal Contacts Data:**

We never scan your device for your contacts or upload that data.

With your consent, we do comply with your requests to collect data about your friends, family or acquaintances (e.g., *Refer a Friend* campaigns). This functionality is only meant for U.S. residents. By using it, you acknowledge and agree that both you and your contacts are based in the United States — and that you have everyone's consent for us to use their contact information.

ii. Information Collected Automatically

- **With Tracking Technologies in Your Browser and Mobile Apps:**

These technologies include cookies, web beacons, tags and scripts, software development kits (or SDKs) and beyond.

We track and store data about how you visit and use Times Services, particularly through our websites and apps. The items we log include:

- Your IP address
- Your location
- Your operating system
- Your browser
- Your browser language

- Your location
- Your operating system
- Your browser
- Your browser language
- The URLs of any pages you visit on our sites and apps
- Device identifiers
- Advertising identifiers
- Other usage information.

We combine this data with other information we collect about you. For more information about tracking methods on Times Services, and how to manage them, read our [Cookie Policy](#).

If your browser doesn't accept our cookies, you can't access certain parts of our websites (e.g., your account on [nytimes.com](#)). Because the "Do Not Track" browser-based standard signal has yet to gain widespread acceptance, we don't currently respond to those signals. We however respond to the [Global Privacy Control](#) in certain territories, such as Europe and California.

• **With GPS Technologies:**

Some of our apps can provide content based on your GPS location, if you enable this feature (e.g., the *New York Times Real Estate app*). Your GPS location is your exact location.

You choose whether to enable GPS features when you first install the app. You can edit that setting on your device at any time. If you enable these features, your GPS location can be found by satellite, cell phone tower or Wi-Fi and used by the app. If you save a location-based search in your history, that data moves to our service provider's servers — [see below](#) for the definition of service provider.

If you do not enable GPS location-based services, or if a specific app does not have location-based features (e.g., the *New York Times app*), we don't collect your precise GPS location. We do collect your IP address, which can establish your approximate location. Ads on our sites and apps may be targeted based on this approximate location, but are never targeted based on your GPS location.

B) Information Collected From Other Sources.

i. **Privately Owned Databases:**

Marketing, data analytic and social media-owned databases give us access to a range of information — like public data, survey data and beyond. This data sometimes includes your mailing address, your gender, your age, your household income and other demographic data.

ii. **Social Media Platforms and Other Third-Party Services:**

(Social media platforms include Facebook. Third-party services include Google and Nook.)

You can link your social media or other third-party account to a Times Service. By linking the services, you authorize us to collect, store and use any information they may give us (e.g., your email address). You can disconnect your [nytimes.com](#) registration from third-party accounts at any time.

We also receive information from you when you interact with our pages, groups, accounts or posts on social media platforms. This includes aggregate data on our followers (e.g., age, gender and location), engagement data (e.g., "likes," comments, shares, reposts and clicks), awareness data (e.g., number of impressions and reach) and individual users' public profiles.

For more information, refer to our [social login](#) and [Nook F.A.Q.](#)

iii. **Workplace and Schools:**

When your employer or school buys an organizationwide subscription to [nytimes.com](#), they sometimes provide us with your name and organization email address to grant you access as a user.

For more information, visit [our social rights and users page](#).

iii. Workplace and Schools:

When your employer or school buys an organizationwide subscription to nytimes.com, they sometimes provide us with your name and organization email address to grant you access as a user.

A note about future updates:

We are always improving our products and services, and we create new features regularly. These updates sometimes require us to collect new information, or use what we already have differently. If there is a significant or material change in the way we handle your personal information, we will notify you as detailed below.

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2. What Do We Do With The Information We Collect About You?

A) We provide the Times Services.

We use your information to help you use and navigate Times Services, such as:

- Making a Times Service available to you
- Arranging access to your account
- Providing customer service
- Responding to your inquiries, requests, suggestions or complaints
- Completing your payments and transactions
- Sending service-related messages (e.g., a change in our terms and conditions)
- Saving your reading list, recipes or property searches
- Displaying your Crossword stats
- Letting you take part in paid services, polls, promotions, surveys, panels, research and comments.

B) We Personalize Your Experience.

We track your interests and reading habits (e.g., the articles you read) to personalize your reading experience using technology like algorithmic recommendations and machine learning. This is how we highlight articles you might be interested in and de-emphasize articles you've already read. For more information about content personalization on Times Services, you can read the [Personalization F.A.Q.](#) We also show you prices, promotions, products or services we believe you'll find interesting, based on demographic and usage data.

C) We Allow You to Share User-Generated Content.

Any information you disclose in your content becomes public — along with your chosen screen name and uploaded photo.

D) We Develop Products and Services, and Do Analysis.

We analyze data on our users' subscription, purchase and usage behaviors. This helps us make business and marketing decisions.

For example, our analysis lets us predict preferences and price points for our products and services. It helps us determine whether our marketing is successful. It also shows us characteristics about our readers, which we sometimes share in aggregate with advertisers.

Google Analytics is one of the analytics providers we use. You can find out [how Google Analytics uses data](#) and [how to opt out of Google Analytics](#).

E) We Carry Out Administrative Tasks.

- For auditing: We verify that our internal processes work as intended and comply with legal, regulatory and contractual requirements.
- For fraud and security monitoring: We detect and prevent cyberattacks or unauthorized robot activities.

- For auditing: We verify that our internal processes work as intended and comply with legal, regulatory and contractual requirements.
- For fraud and security monitoring: We detect and prevent cyberattacks or unauthorized robot activities.
- For customer satisfaction: We assess users' satisfaction with Times Services and our customer care team.

The above activities can involve outside companies, agents or contractors ("service providers") with whom we share your personal information for these purposes (discussed further below).

F) We Offer Sweepstakes, Contests and Other Promotions.

You can take part in our sweepstakes, contests and other promotions. Some might have additional rules about how we use and disclose your personal information.

G) We Allow for Personalized Advertising on Times Services and Create Audiences for Third-Party Advertisers.

We gather data and work with [third parties](#) to show you personalized ads on behalf of advertisers. This data comes from ad tracking technologies set by us or the third party (e.g., cookies), the information you provide (e.g., your email address), your use of Times Services (e.g., your reading history), information from advertisers or advertising vendors (e.g., demographic data) and anything inferred from any of this information. We only use or share this information in a manner that does not reveal your identity. For example, we use Google to serve ads on Times Services. Google uses cookies or unique device identifiers, in combination with their own data, to show you ads based on you visiting nytimes.com and other sites. You can opt out of the use of the Google cookie by visiting the [related Google privacy policy](#).

We also identify groups of users to whom to serve personalized ads on behalf of our advertisers. To do this, we combine information we collect through surveys or registration with information we collect automatically using tracking technologies while you browse our sites and apps. This combined information is used to build models. These data models are then used to measure users' attributes, like their demographic information or their interests. Working with service providers, we use these measurements to group users by common attributes. Each group is associated with a random ID which is then passed to our ad server for use in targeting ad campaigns on our sites and apps.

Another example is our affiliate link vendors, which we use in our guides and product recommendations. Times Services include links that will send you to vendor URLs and other services not operated or controlled by us. These vendors use cookies and other technologies to collect information about your navigation from the Times Services to the merchant you are visiting. If you buy a product after following a link to a link vendor's URL, we may earn a commission.

Additional notes:

- For more about targeted advertising, and how to opt out with your specific browser and device, go to the [DAA Webchoices Browser Check](#) and [NAI Opt Out of Interest-Based Advertising](#). You can [download the AppChoices app](#) to opt out in mobile apps. You can also follow the instructions in the [What Are Your Rights?](#) section below.
- We try to limit how our third-party advertising technology vendors use the information they gather from you. Many of these providers require us to enter into contracts that allow them to optimize their own services and products, or that help them create their own.

Essentially, these providers combine any information they gather about you through Times Services with information they receive from their other clients. This helps them target ads to you on behalf of their other clients, not just us.

- These third parties sometimes use other services in order to serve ads; check [their privacy policies for more details](#). For further information on tracking technologies and your rights and choices regarding them, see the applicable [Cookie Policy](#).

H) We Advertise Times Services to You.

We market our properties to you. Sometimes we use marketing vendors to do this.

We serve ads through websites, locations, platforms and services operated and owned by third parties. Often these ads are targeted at people who have visited or registered

We market our properties to you. Sometimes we use marketing vendors to do this.

We serve ads through websites, locations, platforms and services operated and owned by third parties. Often these ads are targeted at people who have visited or registered for a Times Service but have not subscribed or purchased anything. The ads are also targeted at people with similar traits or behaviors to our subscribers or customers.

We target our advertising to these users by uploading an encrypted customer list to a third party, or by incorporating a tracking technology from a third party onto our Times Service. The third party then matches individuals who appear in both our data and their data. Because of how this matching process works, the third party can't read our encrypted customer list if they don't already have it.

To opt out of receiving these matched ads, contact the applicable [third parties](#). For example, when we use "Custom Audience" to serve you our ad through Facebook, you should be able to hover over the box in the right corner of that Facebook ad and opt out. We are not responsible for any third party's failure to comply with opt-out requests.

We periodically send you targeted email newsletters or promotional emails. For information on opting out of these emails, see [What Are Your Rights?](#)

I) We Aggregate (or De-identify) Personal Information Into Larger Findings.

Sometimes we aggregate or de-identify information so that it can no longer identify you, under applicable laws. This helps us better understand and represent our users, such as when we measure ad performance, create advertising interest-based segments or compile survey results. We can use and disclose this aggregated or de-identified information for any purpose, unless an applicable law says otherwise.

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3. With Whom Do We Share the Information We Gather?

A) Within The New York Times Company:

We share your information with our affiliates for the purposes listed here. See [a list of our affiliates](#).

B) With Service Providers:

We work with service providers, as defined above, to carry out certain tasks:

- Processing your payments
- Fulfilling your orders
- Maintaining technology and related infrastructure
- Offering you customer service
- Serving and targeting ads
- Measuring ad performance
- Presenting surveys
- Shipping you products and mailings
- Distributing emails
- List processing and analytics
- Managing and analyzing research
- Managing promotions

When performing these tasks, service providers often have access to your personal information.

We sometimes allow them to use aggregated or de-identified information for other purposes, in accordance with applicable laws

C) With Other Third Parties:

We sometimes allow them to use aggregated or de-identified information for other purposes, in accordance with applicable laws

C) With Other Third Parties:

There are situations when we share your information with third parties beyond our service providers. We never share your email address with these third parties without your consent, except in encrypted form to engage in the matched ads process described [above](#).

- i. If you're a U.S. print subscriber, we may share your name and mailing address (among other information) with other reputable companies that want to market to you by mail.
- ii. We share information about our live event and conference attendees (*e.g., your name, your company or your job title*) with the event sponsors. In those cases we notify you when you provide us the information.
- iii. We share information about participants in our sweepstakes, contests and similar promotions with the promotions' sponsors. In those cases we notify you when you provide us the information.
- iv. We process payments you make through Times Services with external services.

There are two ways this can happen:

- We collect your information and share it with the third-party service for processing.
 - The third-party service collects your information for processing.
- v. In the event of a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings), we would have a legitimate interest in disclosing or transferring your information to a third party — such as an acquiring entity and its advisers.
 - vi. We can preserve or share personal information if the law requires us to do so. We can also preserve or share personal information if we believe it would be necessary to:
 - Comply with the law or with legal process
 - Protect and defend our rights and property
 - Protect against misuse or unauthorized use of the Times Services
 - Protect the safety or property of our users or the general public (*e.g., if you provide false information or attempt to pose as someone else, we could share your information to help investigations into your actions*)
 - Cooperate with government authorities, which could be outside your country of residence.
 - vii. We disclose public activities in our RSS feeds, APIs and other distribution formats. Your public activities could thus appear on other websites, blogs or feeds.

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4. What Are Your Rights?

A) How Do I Opt Out of Email, Phone, Mail and Push Notifications?

The opt-out methods described below are limited to the email address, phone or device used. They won't affect subsequent subscriptions.

i. Email:

We offer a variety of commercial emails and email newsletters. You can unsubscribe from them by following the "unsubscribe" instructions near the bottom of the email. You can also email us at privacy@nytimes.com.

You can manage your [nytimes.com](https://www.nytimes.com) newsletter preferences.

Email:

We offer a variety of commercial emails and email newsletters. You can unsubscribe from them by following the “unsubscribe” instructions near the bottom of the email. You can also email us at privacy@nytimes.com.

You can [manage your nytimes.com newsletter preferences](#).

ii. Mail or Telephone Promotions:

You can ask us to unsubscribe from our mail or telephone solicitations. You can also ask us to not share your information with third parties for marketing purposes. To do so, call us at 1-800-698-4637 or [chat with us](#). You may also email us at privacy@nytimes.com with “Opt Out” in the subject line, and your account number and phone number in the body of the email.

For International Edition customers, you can write us at: *The New York Times International Edition, Subscription Dept. 18 Museum Street, London, WC1A 1JN, United Kingdom*. Please include your account number and phone number in the body of the letter.

iii. Push Notifications:

You can opt out any time by adjusting your device settings, or uninstalling our app.

iv. Text Messages:

You can opt out of text alerts any time by replying “STOP,” or any alternative keyword we’ve shared with you.

We complete any opt-out request as quickly as we can. This opt-out request won’t prohibit us from sending you important nonmarketing notices.

B) How Do You Access, Change, Delete, Update or Exercise Your Other Rights in Relation to Your Personal Information?

In some parts of the world, you have the right to:

- Access, modify, or delete the personal information we have about you
- Receive an electronic copy of the personal information we have about you, for data portability
- Restrict, or object to, how we process personal information about you
- Not receive discriminatory treatment by us for the exercise of your privacy rights.

You have the right to object to the processing of your personal information based on our legitimate interest or that of a third party — unless we demonstrate compelling legitimate grounds for the processing of, or the keeping of, your personal information for the establishment, exercise or defense of legal claims.

If you’d like to exercise any of the above rights, contact us via [this form](#) or by calling us at our toll-free number, 1-800-NYTIMES. In your request, please be specific. State the information you want changed, whether you’d like your information suppressed from our database or whether there are limitations you’d like us to put on how we use your personal information. Please use the email address linked to that personal information — we only complete requests on the information linked to your email address. To verify your identity, we will email the email address you provide us, and which matches our records, and wait for your response. In some instances we may also ask for additional information. This is how we verify your identity before complying.

You can designate an authorized agent to make a request on your behalf. In order to do that, please provide the agent with written permission, signed by you, authorizing the agent to submit the request on your behalf. The agent must submit that written permission along with the request. We will contact you to verify your identity — and the authorized agent’s permission — before a response to the request is sent.

We’ll respond to your request in a manner consistent with applicable law.

We might need to keep certain information for recordkeeping purposes, or to complete a transaction you began prior to requesting a change or deletion (e.g., *if you make a purchase or enter a promotion, you might not be able to change or delete the personal information provided until after the completion of the purchase or promotion*).

In some cases, your request doesn’t ensure complete removal of the content or information (e.g., *if another user has reposted your content*).

We might need to keep certain information for record-keeping purposes, or to complete a transaction you began prior to requesting a change or deletion (e.g., if you make a purchase or enter a promotion, you might not be able to change or delete the personal information provided until after the completion of the purchase or promotion).

In some cases, your request doesn't ensure complete removal of the content or information (e.g., if another user has reposted your content).

If you'd like, you can lodge a complaint with a data protection authority. A [list of E.U. data protection authorities](#) is available.

C) How Do You Manage Your Digital and Home Delivery Accounts?

You can update your account information and see [your transaction history](#) (for [International Edition print subscribers](#)). If you need assistance, call our toll-free number, 1-800-NYTIMES. [Other local numbers](#) are available.

It works differently if you subscribed via Apple's App Store or Google Play. Register with us to access the Account area, and contact Apple or Google for your transaction history.

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5. What About Sensitive Personal Information?

We generally don't want to gather any sensitive information about you. This includes:

- Your social security number
- Your racial or ethnic origin
- Your political opinions
- Your religion or other beliefs
- Your health, biometric or genetic characteristics
- Any trade union membership
- Any criminal background

There are rare situations when we request this information (e.g., a reader survey asks about your political leanings), but you can decline to answer. Outside those situations we would prefer you never share that information with us.

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6. How Long Do You Retain Data?

It depends. We store your personal information for as long as needed, or permitted, based on the reason why we obtained it (consistent with applicable law). This means we might retain your personal information even after you close your account with us.

When deciding how long to keep your information, we consider:

- How long we have had a relationship with you or provided a Times Service to you
- Whether we are subject to any legal obligations (e.g., any laws that require us to keep transaction records for a certain period of time before we can delete them)
- Whether we have taken any legal positions (e.g., in connection with any statutes of limitation).

Rather than delete your data, we might de-identify it by removing identifying details.

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7. How Do You Protect My Information?

We protect your personal information with a series of organizational, technological and physical safeguards — but we cannot guarantee its absolute security. We recommend that you use complex and unique passwords for your Times accounts and for third-party accounts linked to them. Do not share your password with anyone.

If you have reason to believe your interaction with us is no longer secure, notify us:

We protect your personal information with a series of organizational, technological and physical safeguards — but we cannot guarantee its absolute security. We recommend that you use complex and unique passwords for your Times accounts and for third-party accounts linked to them. Do not share your password with anyone.

If you have reason to believe your interaction with us is no longer secure, notify us immediately.

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8. Are There Guidelines for Children?

Times Services are intended for a general audience, and are not directed at children under (13) years of age.

We do not knowingly gather personal information (as defined by the U.S. Children's Privacy Protection Act, or COPPA) in a manner not permitted by COPPA. If you are a parent or guardian and you believe we have collected information from your child in a manner not permitted by law, contact us at privacy@nytimes.com. We will remove the data to the extent required by applicable laws.

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9. How Is Information Transferred Internationally?

The New York Times Company is headquartered in the United States. If you are located outside the United States, your information is collected in your country and then transferred to the United States — or to another country in which we (or our affiliates or service providers) operate.

If we transfer your data out of the European Economic Area (E.E.A.), we implement at least one of the three following safeguards:

- We transfer your information to countries that have been recognized by the European Commission as providing an adequate level of data protection according to E.E.A. standards (see the [full list of these countries](#)).
- We use a service provider in the United States that is [Privacy Shield](#) certified.
- We take steps to ensure that the recipient is bound by E.U. Standard Contractual Clauses to protect your personal data. You can see a [copy of these clauses](#).

In certain situations, the courts, law enforcement agencies, regulatory agencies or security authorities in those countries might be entitled to access your personal information.

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10. What Is Our Legal Basis?

In some jurisdictions, like the European Union and the European Economic Area, we only collect, use or share information about you when we have a valid reason. This is called "lawful basis." Specifically, this is one of the following:

- The consent you provide to us at the point of collection of your information
- The performance of the contract we have with you
- The compliance of a legal obligation to which we are subject or
- The legitimate interests of The Times or a third party. "Legitimate interest" is a technical term under international laws, including the European Union General Data Protection Regulation. It means that there are good reasons for the processing of your personal information, and that we take measures to minimize the impact on your privacy rights and interests. "Legitimate interest" also refers to our use of your data in ways you would reasonably expect and that have a minimal privacy impact.

We have a legitimate interest in gathering and processing personal information, for example: (1) to ensure that our networks and information are secure; (2) to administer and generally conduct business within The New York Times Company. (3)

protection regulation, it means that there are good reasons for the processing of your personal information, and that we take measures to minimize the impact on your privacy rights and interests. "Legitimate interest" also refers to our use of your data in ways you would reasonably expect and that have a minimal privacy impact.

We have a legitimate interest in gathering and processing personal information, for example: (1) to ensure that our networks and information are secure; (2) to administer and generally conduct business within The New York Times Company; (3) to prevent fraud; and (4) to conduct our marketing activities.

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11. What About Links to Third-Party Services?

Some Times Services contain links to third-party websites, resources, vendors and advertisers. These third parties are not Times Services. We do not control (and are not responsible for) third party content or privacy practices. Any personal data you provide to them is not covered by this Privacy Policy.

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12. How Are Changes to This Privacy Policy Communicated?

We periodically update this Privacy Policy. We will post any changes on this page by updating this policy.

If we make a significant or material change in the way we collect, use or share your personal information, we will notify you at least 30 days prior to the changes taking effect. We will do this via email or prominent notice within Times Services. If you object to any change, you can stop using the Times Services.

After we post any changes on this page, your continued use of Times Services is subject to the updated Privacy Policy.

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13. How Can You Contact Us? Who Is the Controller of Your Personal Information?

If you have any questions, email us at privacy@nytimes.com or write us at:

The New York Times Company
620 Eighth Avenue
New York, N.Y. 10018
Attn.: Privacy Counsel

We can also be reached by phone at 1-800-NYTIMES (see a [list of our local telephone numbers outside the United States](#)).

The New York Times Company is referred to in this Privacy Policy as "The Times," "we" or "our."

Certain Times Services operate as independent controllers of your personal information. Wirecutter operates as an independent controller of personal information collected through the Wirecutter site available at nytimes.com/wirecutter, pages or ads on social media networks, email messages sent by Wirecutter, your offline contacts and any other service offered by Wirecutter (collectively, the "Wirecutter Services"). If you have any questions regarding Wirecutter, email us at privacy@thewirecutter.com or write us at:

Wirecutter, Inc.
c/o The New York Times Company
620 Eighth Avenue
New York, N.Y. 10018
Attn.: Privacy Counsel

Wirecutter operates the Wirecutter Services in accordance with the practices disclosed in this Privacy Policy. With respect to the Wirecutter Services, Wirecutter, Inc. is referred to in this Privacy Policy as included in "The Times," "we" or "our." In this Privacy Policy, Wirecutter Services are included under "Times Services."

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Certain Times Services operate as independent controllers of your personal information. Wirecutter operates as an independent controller of personal information collected through the Wirecutter site available at nytimes.com/wirecutter, pages or ads on social media networks, email messages sent by Wirecutter, your offline contacts and any other service offered by Wirecutter (collectively, the “Wirecutter Services”). If you have any questions regarding Wirecutter, email us at privacy@thewirecutter.com or write us at:

Wirecutter, Inc.
c/o The New York Times Company
620 Eighth Avenue
New York, N.Y. 10018
Attn.: Privacy Counsel

Wirecutter operates the Wirecutter Services in accordance with the practices disclosed in this Privacy Policy. With respect to the Wirecutter Services, Wirecutter, Inc. is referred to in this Privacy Policy as included in “The Times,” “we” or “our.” In this Privacy Policy, Wirecutter Services are included under “Times Services.”

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EXHIBIT 74

Enabling the Hybrid Workforce

Explore how the Zoom platform seamlessly brings together remote and in-person teams, for work that goes wherever you do. Explore hybrid solutions. (<https://explore.zoom.us/docs/en-us/hybrid-workforce.html?zcid=4585>)

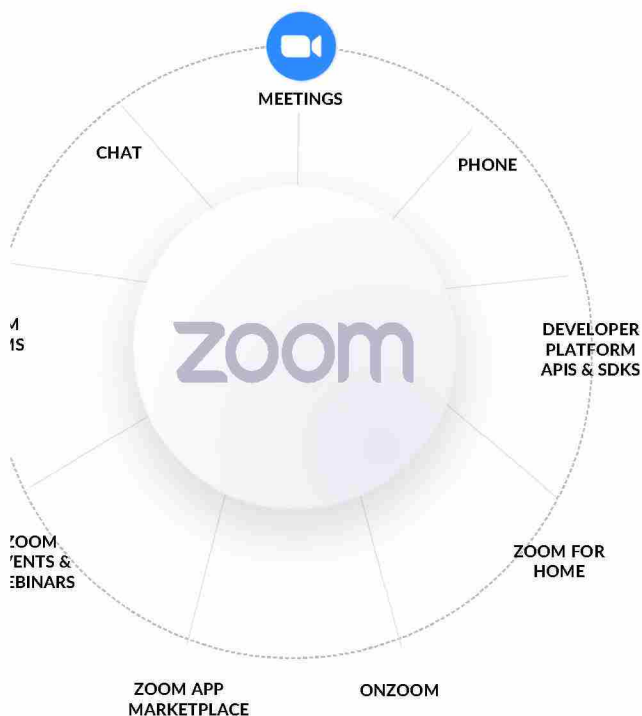
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Zoom is for you. We're here to help you connect, communicate, and express your ideas so you can get more done together. We're proud to be trusted by millions of enterprises, small businesses, and individuals, just like you.

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Jelena Joffe at AB In Bev

(<https://www.youtube.com/embed/HABjoUIYCRE?rel=0&autoplay=1&showinfo=0>)



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Developer Support
(<https://devsupport.zoom.us/>)
Privacy, Security, Legal Policies, and
Modern Slavery Act Transparency
Statement (<https://zoom.us/en-us/trust/legal-compliance.html>)

Language

English ▼

Currency

US Dollars \$ ▼

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More Info



EXHIBIT 75

PRIVACY POLICY

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[European Union Privacy Information](#)

For citizens of member countries of the European Union, and Switzerland, Norway, Lichtenstein, Iceland, Australia, and New Zealand

[Canada Privacy Information](#)

This is the Privacy Policy which applies to you if you live outside the [European Union](#), Switzerland, Norway, Lichtenstein, Iceland, Australia, New Zealand, and [Canada](#).

This Privacy Policy discloses the privacy practices for FORTUNE, the Time Inc. owned and operated websites and mobile apps on which it appears, including those websites listed [here](#), our email newsletters and other applications owned and operated by Time Inc., including offline and online subscriptions and other product offerings (collectively referred to as the "Services"), and to any other services that display this Privacy Policy. Your privacy is important to us. To better protect your privacy, we provide this Privacy Policy explaining our information practices and the choices you can make about the way your information is collected and used by Time Inc. and its subsidiaries.

The Information We Collect

Through the Services, you can, among other activities, order publications and products; engage in various activities like entering contests or sweepstakes, playing games, taking quizzes, voting in polls or otherwise expressing an opinion; subscribe to one of our services, such as newsletters; or participate in one of our online forums or communities. We collect the information, including any personally identifiable information, that you provide to us in the course of using the Services. The types of information that may be collected through these Services include, but are not limited to: name, address, gender, e-mail address, telephone number, fax number and credit or debit card information.

We may also collect information about your personal or professional interests and your use of, or opinions about, various products, programs and services. For instance, we may ask you to identify your job or industry to qualify you for free business magazines.

Through some features of the Services and through certain promotions, you can submit information about other people. For example, you might submit a person's name, mailing and/or e-mail address to send a gift or electronic greeting card. The types of personally identifiable information that may be collected about other people at these pages include: recipient's name, address, e-mail address and telephone number.

We, our partners, advertisers, advertising networks or other third party service providers, as explained further in the **"Collection of Information by Third-Parties"** section below, may also collect certain non-personally identifiable information when you visit our web pages, open our emails, use our applications, or otherwise use the Services, including such information as the type of browser and operating system you are using, your IP address, your device identifiers, your Internet or wireless service provider, location-based information, and the content and advertisements you have interacted with, viewed, or accessed. This data may be combined and linked with data from other sources.

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How We Use the Information

We may use the information collected under this Privacy Policy in the following ways:

- We may use the information you provide about yourself or others to fulfill requests for our publications, products or services, to respond to inquiries about offerings and to offer other products, programs or services that may be of interest.
- We may combine information we receive with outside records and share such information with third parties for use on our behalf to enhance our ability to market to you those products or services that may be of interest to you.
- We may disclose personally identifiable information that we receive from you and from third party sources to third parties whose practices are not covered by this privacy statement (e.g., other marketers, magazine publishers, retailers, participatory databases, and non-profit organizations) that want to market products or services to you.
- When you request a magazine, service, or other product, we will forward the information you give us to the publisher or provider to the extent necessary to fulfill your request. They may contact you with special offers of possible interest.
- We sometimes use this information to communicate with you, such as to notify you when you have won one of our contests or sweepstakes, when we make changes to subscriber agreements, to fulfill a request by you for an online newsletter, or to contact you about your account.
- If you choose to submit content (e.g., a "letter to our editors" or an online review), we may publish your name, screen name and other information you have provided to us. You hereby consent to this.
- The information we collect in connection with our online forums and communities is used to provide an interactive experience. We use this information to facilitate participation in these online forums and communities and, from time to time, to offer you products, programs, or services.
- We sometimes use the non-personally identifiable information that we collect to improve the design and content of our publications and websites, and to enable us to customize your Internet experience. We also may use this information to analyze site usage, as well as to offer you products, programs, or services.
- We will disclose information we maintain when required to do so by law, for example, in response to a court order or a subpoena. We also may disclose such information in response to a law enforcement agency's request.
- Agents and contractors of Time Inc. that have access to personally identifiable information are required to protect this information in a manner that is consistent with this Privacy Policy by, for example, not using the information for any purpose other than to carry out the services they are performing for Time Inc.
- We may transfer your personally identifiable information to other Time Inc. offices for internal management and administrative purposes on our behalf. Your personal data will be transferred to other Time Inc. offices where necessary for the performance or conclusion of our contractual obligations to you or for your benefit. To the extent not prohibited under applicable law, transfers and disclosures of personally identifiable information may also be made where necessary for the establishment, exercise, or defense of legal claims, to protect the rights and property of Time Inc., our agents, customers, and others, including to enforce our agreements, policies, and terms of use; or to protect the personal safety of any person.
- Please note that if Time Inc. or any of its subsidiaries or lines of business is merged, acquired, divested, financed, sold, disposed of or dissolved, including through merger of, consolidation, sale or divestiture of assets, the relevant customer database, including personally identifiable information we may possess about you, may, in whole or in part, be sold, disposed of, transferred, divested, or otherwise disclosed as part of that transaction or proceeding.

Privacy Options

If you prefer not to receive traditional mail or other off-line promotions from this or any other Time Inc. property, or if you want to opt-out of any sharing of your personally identifiable offline information with third parties not owned by Time Inc., please [click here](#).

If you prefer not to receive e-mail marketing from this or any other Time Inc. property, or if you want to opt-out of any sharing of your email address with third parties not owned by Time Inc., please [click here](#).

We will not use or transfer personally identifiable information provided to us in ways unrelated to the ones described above without also providing you with an opportunity to opt out of these unrelated uses.

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Your California Privacy Rights: Notice to California Customers

California's "Shine the Light" law, Civil Code section 1798.83, requires certain businesses to respond to requests from California customers asking about the businesses' practices related to disclosing personal information to third parties for the third parties' direct marketing purposes. Alternately, such businesses may have in place a policy not to disclose personal information of customers to third parties for the third parties' direct marketing purposes if the customer has exercised an option to opt-out of such information-sharing. (Note: Time Inc. sites do not recognize the "do not track signals" that some browsers may employ.) As discussed above, if you wish to opt-out of our sharing of your information with third parties for the third parties' direct marketing purposes offline please [click here](#), or for email please [click here](#). To find out more about your opt-out rights, please contact us as described in the "**How to Contact Us**" section below.

Collection of Information by Third Parties

Some of our Services contain links to third party sites and services whose privacy practices may be different than ours. We also allow you to connect with other third party sites and services. You should consult the other third party sites' and services' privacy notices in order to better understand their privacy practices.

We sometimes may offer contests, sweepstakes, promotions, editorial features, or other activities or offerings that are sponsored or co-sponsored by or presented with identified third parties. By virtue of your participation in such activities or offerings, your IP address and the personally identifiable information that you voluntarily submit may be provided to both the Time Inc. site and the third parties. Time Inc. has no control over the third parties' use of this information.

We may use third parties to present or serve advertisements, including online behavioral advertisements, that you may see on the Services and to conduct research about the advertisements or the Services themselves. Additionally, third parties may place and use tracking mechanisms, e.g., tracking pixels, in the emails we may send to you. This Privacy Policy does not cover any use of information that such third parties may have collected from you (e.g., type of browser, operating system, domain name, day and time of visit, page(s) visited) or the methods used by the third-parties to collect that information (e.g., cookies, web beacons and clear gifs).

For more information on advertisements and your behavioral advertising options, visit our [About Ads page](#) and our [Network Advertising Initiatives page](#).

Note regarding Market Research/Ratings: Our Services may also feature Nielsen's proprietary measurement software which may contribute to market research, like Nielsen's TV Ratings. To learn more about this information, please click [here](#). Nielsen's software may collect your choices with regards to it.

We also may use certain recognition services by our partner LiveRamp. To opt out of such services by LiveRamp, please visit https://liveramp.com/opt_out/.

Cookies and other Tracking Technologies

We may place "cookies" on your computer or device. Cookies are small text files that we place in your computer or device to store your preferences. Cookies, by themselves, do not tell us your e-mail address or other personal information unless you choose to provide this information to us by, for example, registering with one of our Services. Once you choose to provide us with personal information, this information may be linked to the data stored in the cookie. A cookie assigns a unique numerical identifier to your Web browser or device, and may enable us to recognize you as the same user who has used our Services, and relate your use of the Services to other information about you, such as your usage information and personal information.

We use cookies (and Local Shared Objects, HTML5, cache cookies, web beacons, or clear gifs, all described further below) to understand usage of the Services and to improve our content and offerings and to deliver advertisements that you might be interested in. For example, we may use cookies to personalize your experience on our Services (e.g., to recognize you by name when you return to our site, to save your password in password-protected areas, to enable shopping carts, or to tailor content or product and service offerings).

Most browsers automatically accept cookies. You can set your browser option so that you will not receive cookies and you can also delete existing cookies from your browser. However, you may find that some parts of the site will not function properly if you have refused cookies or similar tracking technologies and you should be aware that disabling cookies or similar tracking technologies might prevent you from accessing some of our content. However, your viewing of editorial content may be hampered. If you wish to block cookies, go to <http://www.allaboutcookies.org/> to find out how, or check your browser's instructions.

Some of the tracking technologies we use include:

- **Local Shared Objects:** Local shared objects, such as .Flash cookies, also may be stored on your computer or device. Local shared objects operate a lot like cookies, but cannot be managed in the same way. Depending on how local shared objects are enabled on your computer or device, you may be able to manage them using software settings. For information on managing Flash cookies, for example, see <http://helpx.adobe.com/flash-player/kb/disable-local-shared-objects-flash.html>.
- **HTML 5:** HTML5, the language some Web sites are coded in, may be used to store information on your computer or device about your Service usage activities. This information may be retrieved by us to help us manage our Services, such as by giving us information about how our Services are being used by our visitors, how they can be improved, and to customize them for our users.
- **Cache Cookies:** Cache cookies, such as eTags, may be used to identify your computer or device as the same computer or device that visited a Service or Services in the past.
- **Web Beacons:** Our websites may also use small pieces of code called "web beacons" or "clear gifs" to collect anonymous and aggregate advertising metrics, such as counting page views, promotion views, or advertising responses. A web beacon is an electronic image called a single-pixel or clear GIF. Web beacons can recognize certain types of information, such as a user's cookie number, time and date of a page view, and description of the page where the web beacon is placed. These web beacons may be used to deliver cookies that conform to our cookie policy above.

These tracking technologies may be deployed by us and/or by our service providers or partners on our behalf. These technologies enable us to assign a unique number to you, and relate your Service usage information to other information about you, including your personal information. We may match information collected from you through different means or at different times, including both personal information and Service usage information, and use such information along with offline and online information obtained from other sources (including third parties) such as demographic information and updated contact information (where that information has been lawfully disclosed to us) for the purposes of learning more about you so we can provide you with relevant content.

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Our Commitment to Security

We have put in place appropriate administrative, technical, and physical safeguards to help prevent unauthorized access, maintain data security and correctly use the information we collect. No system can be completely secure, however, and we do not guarantee that unauthorized disclosures and access will not happen. Although we take appropriate measures to safeguard against unauthorized disclosures of information, we cannot assure you that personally identifiable information that we collect will never be disclosed in a manner that is inconsistent with this Privacy Policy.

Accessing, Correcting, and Deleting Your Personal Information

We will take reasonable steps to accurately record the personal information that you provide to us and any subsequent updates.

We encourage you to review, update, and correct the personal information that we maintain about you, and you may request that we delete personal information about you that is inaccurate, incomplete, or irrelevant for legitimate purposes, or are being processed in a way which infringes any applicable legal requirements, by contacting us as set out in the "How to Contact Us" section below. At our election, instead of deleting such information, we may retain it with your comment or correction noted in our records. By contacting us, you may also object to our further use of your personal information if you have compelling legitimate grounds (this may involve closing your account). We may ask you to verify your identity and to provide other details before we are able to provide you with any information, correct any inaccuracies, or delete any information. Your right to review, update, correct, and delete your personal information may be limited, subject to the law or your jurisdiction: (i) if your requests are abusive or unreasonably excessive, (ii) where the rights or safety of another person or persons would be encroached upon, or (iii) if the information or material you request relates to existing or anticipated legal proceedings between you and us, or providing access to you would prejudice negotiations between us or an investigation of possible unlawful activity. Your right to review, update, correct and delete your information is subject to our records retention policies and applicable law, including any statutory retention requirements.

Retention of Personal Information

We will retain your personal information while you have an account with us and thereafter for as long as we need it for purposes not prohibited by applicable laws. Thereafter, we will either delete your personal information or de-identify it so that it is anonymous and not attributed to your identity. Your rights to request that we delete your personal information are set forth in the "**Accessing, Correcting, and Deleting Your Personal Information**" section above.

Special Note for Parents

The site you are visiting is one of the Time Inc. general audience sites and is not intended for use by children. For more information about our online privacy practices for children's sites, consult the privacy notice at the children's site in which you are interested.

Changes to this Privacy Policy

This Privacy Policy may be changed by Time Inc. The revised Privacy Policy will be posted to this page so that you are aware of the information we collect, how we use it, and under what circumstances we may disclose it.

How to Contact Us

If you have any questions or concerns about the Time Inc. Privacy Policy or its implementation please contact us via email by [clicking here](#) or by writing to:

Time Customer Service
Attention: Consumer Affairs
3000 University Center Drive
Tampa, Florida 33612-6408

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This Privacy Policy was revised September 29, 2017.

EXHIBIT 76

PRIVACY

Privacy Notice/Notice At Collection

Privacy Notice /Notice At Collection – Highlights

Last Updated: July 1, 2021

When you use or interact with a U.S. website, mobile app or other digital service (each a “**Digital Service**”) operated or owned by Hearst Magazine Media, Inc. or its affiliates, we and third parties may obtain certain information about you. In this Highlights section, we provide an overview of our privacy practices related to the Digital Services. Please review our full **Privacy Notice** below for a detailed explanation of our practices.

What Information We Obtain

- Information you provide when you use the Digital Services, including when you sign up for newsletters, order subscriptions, create an account or register for a membership through the Digital Services. This may include your contact, payment or demographic information.
- Information you submit when you choose to participate in a survey, sweepstakes, contest, promotion, event or similar initiative.
- Information you give us about others, such as a friend’s contact information when you order a gift subscription.
- Information collected by automated means such as cookies or pixels. This may include information about your device and browser, including IP address or mobile device advertising identifiers, as well as information about how you and others use, interact with or respond to the Digital Services. This collection may take place while you are using a Digital Service or while the Digital Service is running in the background of your device.
- Precise location information associated with your device when location services are active.
- Information we obtain from other sources, such as business partners, data suppliers and social media platforms.

Read more in **section B. What Information We Obtain.**

How We Use Information We Obtain

- To process your requests and provide you with the Digital Services, including to deliver customized content or recommendations. Note that we use your payment card information (such as your card number and expiration date) for limited purposes such as to process your transaction (including recurring payments, if applicable), to provide you with the requested products or services and to protect our rights or the rights of others.
- To learn about users of the Digital Services and analyze how you and others interact with and respond to the Digital Services.
- To communicate with you, including to send you marketing and promotional communications.
- For advertising and marketing purposes, including to deliver **interest-based ads (_INTEREST_BASED)**, for cross-device linking and to analyze the performance of advertising and marketing activities.
- To protect our rights and the rights of others.

Read more in **section C. How We Use the Information We Obtain.**

How We Share Information

- Within the Hearst family of companies.
- With service providers that perform services or handle transactions on our behalf.
- With advertisers, advertising- and marketing-related services providers and partners as well as companies that help us learn how you and others interact with our content.
- With social media platforms and similar services, including when you interact with our Digital Services that integrate tools and services provided by social media platforms.
- With business partners, such as when we partner with a third party to offer products or services on a co-branded basis.
- Other parties when required by law or as necessary to protect our rights, and in the context of corporate transactions.

- With your consent or otherwise at your direction.

Read more in **section D. How We Share Information.**

Your Choices, Including Marketing and Interest-Based Ads Opt-Outs

- You may take steps to limit the use of your information for interest-based advertising on your browser or mobile device. See **section Interest-Based Ads Opt-Outs** for more information.
- You may unsubscribe from our marketing or promotional emails by clicking the “Unsubscribe” link in our emails, or for certain Digital Services, by logging into your account and adjusting your preferences.

Read more in **section E. Your Choices, Including Marketing and Interest-Based Ads Opt-Outs.**

Additional Information

- We use a variety of security technologies and procedures to help protect information from unauthorized access, use or disclosure.
- The Digital Services are operated from the United States. Information may be processed and stored in the United States or other countries.
- The Digital Services are not intended for use by children under the age of 13.
- This Privacy Notice is part of the **Terms of Use** (<https://www.hearst.com/-/us-magazines-terms-of-use>), which govern your use of the Digital Services and any disputes related to your use of the Digital Services (including our use of your information) will be resolved per the dispute resolution provision in the Terms of Use.
- Additional disclosures and rights apply to California residents and European visitors. These are included at the end of this Privacy Notice.

Read more in **section N. Additional Information for California Residents** and **section O. Additional Information for European Visitors.**

Contact Us

If you have questions about our Privacy Notice you can contact us by email at magsprivacy@hearst.com (<mailto:magsprivacy@hearst.com>). If you have any questions about your California Consumer Privacy Act of 2018 (CCPA) rights, please contact us at

ccpamagsrequests@hearst.com. (mailto:ccpamagsrequests@hearst.com.)

PRIVACY NOTICE/NOTICE AT COLLECTION

Last Updated: July 1, 2021

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A. INTRODUCTION

This Privacy Notice /Notice At Collection (the "**Privacy Notice**") applies to the U.S. website, mobile application or other digital service (each a "**Digital Service**") linking to this Privacy Notice and owned or operated by Hearst Magazine Media, Inc. or its affiliates ("**we**", "**us**", "**our**" or "**Hearst**"). This Privacy Notice describes the privacy practices of Hearst only and does not cover the practices of other companies, including those that may advertise or sponsor content, products or services on the Digital Services.

B. WHAT INFORMATION WE OBTAIN

When you use a Digital Service, we may obtain various types of information related to you and your use of the Digital Service. This may include information that directly identifies you such as your name, address, or contact information (this type of information may be called "personal information" or "personally identifiable information"). The information we obtain generally consists of information (1) you give us about yourself, (2) you give us about others, (3) automatically collected about your interactions with the Digital Services and our content or ads on third-party websites, apps or other media, and (4) we get from other sources.

1. Information you give us

We may ask you to provide information about yourself when you use the Digital Services. For example, to subscribe to one of our newsletters, you will need to give us an email address. You may not be able to use certain features if you choose not to submit the requested information.

The information you give us may include details such as:

- Contact information (e.g., name, mailing address, email address or phone number).
- Demographic, interests and household information (e.g., age, gender or education).
- Payment information for subscriptions or purchases made through the Digital Services (e.g., payment card number, expiration date and billing information).
- Comments, photos, videos and other content or information you choose to publish on the Digital Services or otherwise share with us.
- Information you provide when you choose to participate in surveys, polls, sweepstakes, contests or promotions (including information about your participation in activities that may generate loyalty or rewards points).
- Location information, which may include precise location information when you permit the Digital Services to access device location. To prevent the collection of precise location information, please refer to instructions provided by your mobile service provider or device manufacturer.
- Other information you may allow us to access through your device's permissions settings, such as your contacts or address book.

- Transactional and activity information (e.g., requests, searches or orders).

2. Information you give us about others

You may give us information about other people, such as the name and email of a friend or contact with whom you want to share an article or the name and address of a gift subscription recipient. Do not give us information about others unless you are authorized or have their consent to do so. We will use their information for the purposes described in this Privacy Notice.

3. Information automatically collected

The Digital Services automatically log certain information about visits to the Digital Services, such as the number and frequency of visitors, technical information about browsers and devices used to access the Digital Services, and information about crashes or other technical issues. In addition, we and third parties may automatically collect certain information through automated means about your activities over time across the Digital Services as well as across third-party sites, apps or other media. The tools that collect this information vary depending on the Digital Services and include technologies such as cookies, web beacons, tags, scripts, pixels, local shared objects (including HTML5 cookies) and software development kits ("SDKs"). These technologies may be included in our web pages, mobile apps, emails, and other digital content. The tools may assign or collect unique cookie IDs or other identifiers associated with your browser or device. The tools may collect information while you are using our Digital Services or while they are running in the background of your device.

The information automatically collected may include:

- Information about your computer, device, browser and operating system (e.g., type, model, or version).
- Internet protocol (IP) address, which may be used to derive your general geographic area (e.g., city and country).
- Device identifiers (e.g., mobile advertising IDs).
- Information about your interactions with the Digital Services, including browsing activities and clickstream data that reflect the content you have accessed, clicked on, or viewed.
- Information about how you accessed the Digital Services, including details about websites or apps visited immediately before or after accessing a Digital Service.

- Demographic, interests and household information.
- Information about your interactions with email messages and other communications, such as whether you opened or forwarded the email or clicked on links contained in the email.

For more information about the use of automated means in the context of interest-based advertising and how you can limit tracking, see **section C. 3 For advertising and marketing purposes, including interest-based advertising.**

4. Information we obtain from other sources

We receive information about you from other sources and it may be combined with other information about you. For example, we may obtain data from:

- Operators of third-party sites or apps, content distribution channels and platforms (e.g., Roku, Amazon Fire TV), voice-activated assistants (e.g., Amazon Alexa, Google Home) or other devices and technologies when you interact with our content, products, services or ads available on those channels and platforms. The information we receive may include information about the content you view or access as well as your demographic information and information about your interests.
- Third-party data suppliers such as data aggregators, data resellers, public databases and business partners. They may provide us with demographic information, information about your purchases, and other information that helps us learn about you and other users of the Digital Services.
- Social Media Platforms and similar services ("**Social Media Platforms**"). When you engage with our content or ads on Social Media Platforms, or interact with features on the Digital Services that contain content or features provided by Social Media Platforms (e.g., login or sign in features or tools that allow you to share our content with others on Social Media Platforms), we may obtain information from Social Media Platforms, including your username, user ID, demographic information and other information, subject to the settings and privacy practices of the relevant Social Media Platform. We may obtain this information directly from the Social Media Platform or through plug-ins, integrations or applications. Please keep in mind that the **operators of the Social Media Platforms may also gather information** about your use of the Digital Services and their features and tools.

C. HOW WE USE INFORMATION WE OBTAIN

If you make a purchase or place an order through or in connection with a Digital Service,

we use your payment card information (e.g., your card number and expiration date) for limited purposes such as to process your transaction (including recurring payments, if applicable), to provide you with the requested products or services and for the purposes described under the section "To protect our rights or the rights of others" below.

With respect to information other than your payment card information, we use that information:

1. To provide you with the Digital Services. This includes:

- Processing your requests regarding the Digital Services and our subscriptions, products or services, or your participation in a survey, sweepstakes, contest, promotion, event or similar initiative.
- Providing customer assistance or technical support.
- Customizing content, providing recommendations and enhancing the quality and your overall experience with the Digital Services, including by retaining your user preferences or presenting content in the most effective manner for the browser or device you use to access the Digital Services.
- Maintaining, operating, improving and developing the Digital Services and related content, products or services, including developing new products and features based on users' interactions with the Digital Services.
- Learning about users of the Digital Services and analyzing how you and others interact with and respond to the Digital Services, including by measuring and optimizing usage, reliability and performance, conducting market research, analyzing trends, and supporting our operations (e.g., for accounting, auditing, financial, legal or other purposes).

2. To communicate with you. This includes:

- Sending you informational messages about the Digital Services (e.g., to confirm your subscription or notify you of changes to a Digital Service).
- Delivering marketing or promotional communications, including offers or promotions about our or third parties' products, services or other initiatives.
- Responding to your questions or addressing your requests.
- Communicating with you about surveys, sweepstakes, contests, promotions or

events.

3. For advertising and marketing purposes, including interest-based advertising. This includes:

- Developing, managing and conducting advertising and marketing campaigns, promotions and offers, including about our content, products and services or third parties' products, services and other initiatives.
- Interest-based advertising (also known as targeted or personalized advertising or ads) is advertising based on your interests as inferred from your activities over time on the Digital Services and online services operated by third parties, as well as information from other sources, including information collected offline. Interest-based ads may consist of text ads, images, animations or videos and may be displayed to you based on various factors, including the context of the site or app in which they appear (e.g., sport or travel section), information you provided to the operator of the site or app (e.g., when you created an account), your activities on the site or app (e.g., pages viewed, searches performed or ads clicked), and information such as your demographic, interests and household information.
 - On the Digital Services and on third-party sites, apps or other media, we, our service providers and third parties may use automated means to (a) collect information for interest-based advertising purposes or (b) serve you interest-based ads. These automated means vary depending on the Digital Services and include technologies such as cookies, web beacons, tags, scripts, pixels, local shared objects (including HTML5 cookies) and SDKs. These technologies may use unique identifiers associated with your browser or device to support interest-based advertising.
 - We may use and/or combine online and offline information we obtain about you, including your personal information, for interest-based advertising purposes. We may aggregate the information we obtain to create audiences that are most likely to respond to ads based on demographic, interests or household information.
 - Interest-based ads may be displayed to you by third parties, such as ad networks or exchanges.
 - There are steps you can take to limit the collection of your information for interest-based advertising purposes. These steps vary for the web and mobile app environments and are browser and device specific. To learn more about

interest-based advertising and opt-out choices, see

<http://www.aboutads.info/choices/> (<http://www.aboutads.info/choices/>)

and in the section **Interest-Based Ads Opt-Outs**.

- In serving interest-based ads, we adhere to the Self-Regulatory Principles for Online Behavioral Advertising developed by the Digital Advertising Alliance.

- Cross-device linking. If you access the Digital Services from multiple browsers or devices, we, our service providers and third parties may try to establish connections among and link the different browsers and devices you use to access the Digital Services and our content or ads published elsewhere. This helps us provide you with a seamless experience across the browsers and devices you use and serve you with more relevant content and ads (e.g., so that we don't show you the same article twice). See **section Website (Browser) Opt-Outs** for steps you can take to limit browser and mobile app tracking for interest-based advertising purposes.

- Analyzing and measuring the performance, effectiveness and reach of our advertising (including interest-based ads) and marketing efforts on the Digital Services and elsewhere.

4. To protect our rights or the rights of others. This includes:

- Detecting, preventing and responding to fraud or potentially illegal activities, misuse of the Digital Services, intellectual property infringement or other violations of law, this Privacy Notice, our Terms of Use or other Hearst policies.
- Performing audits, assessments and testing or troubleshooting activities.
- Backing up our systems (including for disaster recovery purposes) and enhancing the overall security of the Digital Services.
- Complying with and enforcing applicable industry and legal requirements (including legal process such as court orders, warrants or subpoenas) and fulfilling contractual obligations.

D. HOW WE SHARE INFORMATION

We may share the information we obtain with:

1. Affiliates and Subsidiaries. We work closely with affiliates and subsidiaries within the Hearst family of companies with whom we share your information as necessary or

appropriate to operate the Digital Services.

2. Service Providers. In connection with the operation and provision of the Digital Services, we engage various third parties to provide services or handle transactions on our behalf, such as payment card processing, email distribution, list processing, postal mailing, cloud computing, analytics, digital content performance measurement, ad serving and managing sweepstakes, contests, promotions or events. These service providers use the information we provide to them as necessary or appropriate for the performance of their services.

3. Advertisers, Advertising- and Marketing-Related Service Providers and Partners. We may provide your information to advertisers, advertising agencies, ad networks, ad exchanges, marketing businesses, technology vendors and other entities that create, deliver and assess advertising or marketing campaigns, including interest-based ads.

4. Content Measurement Companies. We and third parties seek to measure the performance of content across the internet, including on the Digital Services. We may include third-party measurement software in the Digital Services to enable market research or to measure digital and video content consumption.

5. Social Media Platforms. If you interact with social media widgets, share content using social media share buttons, or access features of the Digital Services that contain content or features provided by Social Media Platforms, the relevant Social Media Platforms may collect information. We encourage you to review the privacy policies of the Social Media Platforms that you engage with as we are not responsible for their privacy practices.

6. Business Partners. We may provide your information to business partners including, without limitation, joint marketing partners and content sponsors, for various purposes. For example, we may partner with a third party to offer products on a co-branded, co-sponsored or cross-promotional basis that involves the sharing of information. These initiatives may be offered on the Digital Services or on other media.

7. Other Parties When Required by Law or As Necessary to Protect Our Rights. We may share your information as we believe is necessary or appropriate to protect, enforce, or defend our legal rights, the privacy or safety of our employees, users of the Digital Services or other individuals and entities, or to comply with or enforce applicable industry standards, law or legal process, including responding to court orders, warrants, subpoenas and other requests from public and government authorities.

8. Corporate Transactions. We reserve the right to transfer any of the information we have about you to proceed with the consideration, negotiation, or completion of a sale or transfer of all or a portion of our business or assets to a third party, such as in the event of a

merger, acquisition or other disposition, or in connection with a bankruptcy reorganization, dissolution, or liquidation.

9. With Your Consent or Otherwise at Your Direction. In addition, we may share your information with third parties when you consent to or request such sharing.

E. YOURS CHOICES, INCLUDING MARKETING AND INTEREST-BASED ADS OPT-OUTS

Direct Marketing Opt-Outs

1. Email marketing. You may opt out of receiving marketing or promotional emails from us by clicking on the "unsubscribe" link contained in such emails. Depending on the Digital Service you use, you also may be able to opt out of marketing or promotional emails by logging into your account and managing your email preferences. Please keep in mind that if you opt out of receiving marketing or promotional emails, we may still send you transactional emails or other communications relating to your use of the Digital Services (e.g., to confirm your subscription, to inform you of changes to a Digital Service or in response to your password recovery request).

2. Text message marketing. If you choose to participate in a text message marketing campaign or promotion offered in connection with a Digital Service, you may opt out of receiving marketing texts from us by following the instructions contained in those messages (e.g., texting the word STOP) or provided to you when you elected to receive text message marketing.

3. Direct mail. You may request that we stop sending you postal mail offers through the US post office by notifying us in writing at Office of General Counsel, Attn: Privacy, 300 West 57th Street, New York, NY 10019. Please indicate in your correspondence the name of the Digital Service or publication to which your request applies.

4. Marketing by Third Parties. We may provide your contact information to third parties for their own marketing purposes. To request that third parties do not use your postal mailing contact information for their own marketing purposes (if we have your postal address), you may notify us in writing at Office of General Counsel, Attn: Privacy, 300 West 57th Street, New York, NY 10019. Please indicate in your correspondence the name of the Digital Service or publication to which your request applies. In addition, you may be able to request that third parties do not use your email address (if we have it) for their own marketing purposes by logging into your account or the preferences center (if available) for the relevant Digital Service and adjusting your email preferences.

5. Co-Branded, Co-Sponsored or Cross-Promotional Offerings. If you choose to participate in a co-branded, co-sponsored or cross-promotional offering, the brand, sponsor or other third party involved in that offering may use your information for its own purposes, including advertising and marketing purposes. You must contact the relevant third party directly to exercise your opt out choices with respect to such party's use of your information.

Interest-Based Ads Opt-Outs

Some of the ads you see on the Digital Services are interest-based ads described in **section C. 3 For advertising and marketing purposes, including interest-based advertising**. This means that these ads are customized based on the information we and others obtain about you. We describe below steps you can take to limit tracking of your activities and the delivery of interest-based ads in browsers and mobile apps you use to access the Digital Services. Please keep in mind that if you opt out of interest-based ads, you will still see ads, but these ads will not be based on your inferred interests. In addition, if you take the steps described below, some automated means may still be used to collect information about your interactions with the Digital Services for the other purposes described in this Privacy Notice (e.g., to remember user preferences or enable specific functionality).

The technologies used to deliver ads on websites and mobile apps differ. Please also remember that opt-outs are browser and device-specific.

Website (Browser) Opt-Out

1. Disabling Cookies. Most browsers accept cookies by default. You may be able to change the settings to have your browser refuse certain cookies or notify you before accepting cookies.

- If you choose to disable the use of cookies in your web browser, some features of the Digital Services may become difficult to use or unavailable.

2. Opt-out Cookies. You can follow the instructions provided by the Digital Advertising Alliance ("DAA") here (<http://www.aboutads.info>) and/or the Network Advertising Initiative ("NAI") (<http://optout.networkadvertising.org>) here to place an opt-out cookie on your browser. These opt-out cookies enable you to block participating companies from installing future cookies on your computer or browser.

- If you place opt-out cookies but subsequently clear or delete cookies on your computer or device browser, your opt-out cookies may be deleted and you may have to renew your opt-out choices for that specific browser.
- The opt-out mechanisms offered by the DAA and NAI are provided by third parties.

Hearst does not control or operate these mechanisms or the choices provided through these mechanisms.

- The Digital Services may use measurement technology provided by Nielsen, including the Nielsen Digital Ad Ratings (DAR) Service for Google Ad Manager. To learn more about Nielsen digital measurement products and your choices applicable to them, including in mobile apps and connected devices, please visit <http://www.nielsen.com/digitalprivacy> (<http://www.nielsen.com/digitalprivacy>) for more information.

Mobile App Opt-Out

1. **Device Settings.** To limit interest-based advertising on your mobile device, you can review and **adjust the settings provided by your device manufacturer**, such as “Limit Ad Tracking” for iOS (<https://support.apple.com/en-lamr/HT202074>) or “Opt-out of interest-based ads ” for Android (<https://policies.google.com/technologies/ads?hl=en>).
2. **AppChoices Application.** You can download the “AppChoices” application provided by the DAA from your app store. AppChoices offers a mechanism to limit the collection of app data used for interest-based ads by participating companies. See **the AppChoices provided by the DAA** (<http://youradchoices.com/appchoices>) for more.

Please keep in mind that as the mobile environment continues to evolve, additional opt-out mechanisms or privacy settings may become available to you. We encourage you to review the information on opt-outs and settings that device manufacturers, technology companies and industry associations make available to you.

Do Not Track

Hearst does not currently take steps to respond to browsers “Do Not Track” signals as no uniform standard to respond to such signals has been developed at this time.

Additional Choices

1. **User account.** If you have created an account on a Digital Service, you may be able to review some of your information for that account by logging in and updating your information or user preferences.
2. **Device Settings.** For relevant Digital Services, you may be able to review and adjust your preferences by updating the settings on your device (e.g., permitting us to collect precise location information).
3. **Push Notifications.** If a Digital Service enables push notifications on your device, you

may review and update your push notification preferences by adjusting the settings on your device. For example, you can select the relevant app from "Notifications" (for iOS devices) or "App notifications" (for Android devices) and turn off alerts accordingly.

F. HOW WE PROTECT YOUR INFORMATION

We use a variety of security technologies and procedures to help protect information from unauthorized access, use or disclosure. However, no method of transmission over the internet, or method of electronic storage, is 100% secure. Therefore, while we make reasonable efforts to protect your personal information, we cannot guarantee its absolute security.

G. NON-U.S. VISITORS

We operate the Digital Services from the United States. Any information we obtain about you in connection with your use of the Digital Services may be processed and stored in the United States or other countries.

H. CHILDREN'S PRIVACY RIGHTS

The Digital Services are not intended for use by children, especially those under the age of 13, and we do not knowingly collect personal information from children under the age of 13.

I. LINKS TO THIRD-PARTY WEBSITES, MOBILE APPS OR OTHER SERVICES

The Digital Services may contain links to websites, mobile apps or other services operated by companies not affiliated with Hearst. In addition, the Digital Services may be made available to you through third-party platforms (such as app stores or Social Media Platforms) or other channels. We are not responsible for the privacy practices of any non-Hearst operated websites, mobile apps or other services and channels, and we encourage you to review the privacy policies or notices published by relevant third parties.

J. CAREERS/JOB OPPORTUNITIES

This Privacy Notice does not apply to web pages hosting our careers or job opportunities. Any information obtained through such pages is governed by the privacy notice published thereon.

K. DISPUTE RESOLUTION/TERMS OF USE

Any dispute concerning the Digital Services (including our use of your personal information) will be resolved per the dispute resolution provision in the **Terms of Use** (<https://www.hearst.com/-/us-magazines-terms-of-use>), which govern your use of the

Digital Services. Please take a few minutes to read the Terms of Use before using the Digital Services.

L. CHANGES TO THIS PRIVACY NOTICE

We may update this Privacy Notice from time to time to reflect changes in our privacy practices or applicable laws. In accordance with applicable law, we may make such changes without prior notice. We will publish the updated version on the relevant Digital Services and indicate at the top of the Privacy Notice when it was most recently updated. Your use of the Digital Services will be governed by the then-current version of the Privacy Notice.

M. CONTACT US

If you have any questions about this Privacy Notice, please contact us by email at **magsprivacy@hearst.com (mailto:magsprivacy@hearst.com)**. For questions related to your California Consumer Privacy Act of 2018 (CCPA) rights, please contact us by email at **ccpamagsrequests@hearst.com. (mailto:ccpamagsrequests@hearst.com.)** Please note that we do not accept CCPA rights requests through that mailbox and we ask you to submit **your CCPA rights requests using the methods listed in section N. Additional Information for California Residents.**

N. ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS

Under California law, specific disclosures are required and California residents have additional rights regarding their personal information. Please review this section to learn more.

Your California Consumer Privacy Act of 2018 (CCPA) Rights

Categories of Personal Information We Collect

The California Consumer Privacy Act of 2018, as amended from time to time ("CCPA") requires specific disclosures for each category of personal information that we collect. The table below summarizes our general data handling practices which are more fully described in Sections B, C and D of this Privacy Notice.

Category of Personal Information	Categories of Sources From Which Personal Information Was Collected (See Section B of this Privacy Notice for additional information)	Business or Commercial Purpose for Collecting and Sharing the Category of Personal Information (See Sections C and D of this Privacy Notice for additional information)	Categories of Third Parties and Other Entities We Share Personal Information With (See Section D of this Privacy Notice for additional information)
Identifiers (§1798.140 (o)(1)(A) and (B)) which include elements such as: (i) contact information (e.g., name, mailing address, email address, phone number); and (ii) online identifiers (e.g., Internet protocol (IP) address, account numbers, device identifiers such as mobile advertising IDs)	<ul style="list-style-type: none"> • Directly from you • From your friends or contacts (for example, if they forward you one of our articles) • From cookies and similar technologies • From third-party sites or apps, content distribution channels and platforms • From third-party data suppliers and business partners • From social media platforms and similar services 	<ul style="list-style-type: none"> • To provide you with and to improve the Digital Services • To communicate with you • For advertising and marketing purposes for us or third-parties, including interest-based advertising • To protect our or others' rights 	<ul style="list-style-type: none"> • With affiliates and subsidiaries • With service providers • With advertising and marketing service providers and partners • With content measurement companies • With social media platforms • With business partners • With government authorities as required by law or as necessary to protect our rights

<p>Demographics (§1798.140 (o)(1)(C)) which include elements such as age and gender</p>	<ul style="list-style-type: none"> • Directly from you • From cookies and similar technologies • From third-party sites or apps, content distribution channels and platforms • From third-party data suppliers and business partners • From social media platforms and similar services 	<ul style="list-style-type: none"> • To provide you with and to improve the Digital Services • For advertising and marketing purposes for us or third-parties, including interest-based advertising 	<ul style="list-style-type: none"> • With affiliates and subsidiaries • With service providers • With advertising and marketing service providers and partners • With content measurement companies • With social media platforms • With business partners • With government authorities as required by law or as necessary to protect our rights
<p>Personal Information under subdivision (e) of Section 1798.80 of the California Civil Code (§1798.140 (o)(1)(B)) which includes payment information (e.g., payment card number, expiration date and billing information)</p>	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • To provide you with and to improve the Digital Services • To protect our or others' rights 	<ul style="list-style-type: none"> • With affiliates and subsidiaries • With service providers • With government authorities as required by law or as necessary to protect our rights
<p>Commercial Information (§1798.140 (o)(1)(D)) which include elements such as: transactional information (e.g., activity, subscriptions, requests, purchases, items in your cart but not completed purchases)</p>	<ul style="list-style-type: none"> • Directly from you • From cookies and similar technologies 	<ul style="list-style-type: none"> • To provide you with and to improve the Digital Services • To communicate with you • For advertising and marketing purposes for us or third-parties, including interest-based advertising • To protect our or others' rights 	<ul style="list-style-type: none"> • With affiliates and subsidiaries • With service providers • With advertising and marketing service providers and partners • With social media platforms • With business partners • With government authorities as required by law or as necessary to protect our rights

<p>Internet or other electronic network activity (§1798.140 (o)(1)(F)) which include elements such as information about how you use, access, or interact with the Digital Services such as comments, photos, videos and other content you choose to publish on the Digital Services, information about your device, browser or operating system);</p>	<ul style="list-style-type: none"> • From cookies and similar technologies • From third-party sites and apps, content distribution channels and platforms • From third-party data suppliers and business partners • From social media platforms and similar services 	<ul style="list-style-type: none"> • To provide you with and to improve the Digital Services • To communicate with you • For advertising and marketing purposes for us or third-parties, including interest-based advertising • To protect our or others' rights 	<ul style="list-style-type: none"> • With affiliates and subsidiaries • With service providers • With advertising and marketing service providers and partners • With content measurement companies • With social media platforms • With business partners • With government authorities as required by law or as necessary to protect our rights
<p>Geolocation Data (§1798.140 (o)(1)(G)) which include elements such as location information (e.g., city and state, or precise location information if location services are active on your device)</p>	<ul style="list-style-type: none"> • Directly from you • From cookies and similar technologies 	<ul style="list-style-type: none"> • To provide you with and to improve the Digital Services • To communicate with you • For advertising and marketing purposes for us or third-parties, including interest-based advertising • To protect our or others' rights 	<ul style="list-style-type: none"> • With affiliates and subsidiaries • With service providers • With advertising and marketing service providers and partners • With content measurement companies • With social media platforms • With business partners • With government authorities as required by law or as necessary to protect our rights

<p>Audio, Electronic, Visual, Thermal, Olfactory or Similar Information (§1798.140 (o)(1)(H)) which include elements such as recordings of your calls with our call center</p>	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • To provide you with and to improve the Digital Services • To communicate with you • To protect our or others' rights 	<ul style="list-style-type: none"> • With affiliates and subsidiaries • With service providers
<p>Professional or Employment-Related Information (§1798.140 (o)(1)(I)) which include elements such as your professional email address, phone number or other contact information if you have used such professional or employment related personal information to order a subscription, register for an account or to receive communications</p>	<ul style="list-style-type: none"> • Directly from you 	<ul style="list-style-type: none"> • To provide you with and to improve the Digital Services • To communicate with you • For advertising and marketing purposes for us or third-parties, including interest-based advertising • To protect our or others' rights 	<ul style="list-style-type: none"> • With affiliates and subsidiaries • With service providers • With advertising and marketing service providers and partners • With content measurement companies • With social media platforms • With business partners • With government authorities as required by law or as necessary to protect our rights

<p><i>Inferences (§1798.140 (o)(1)(K)) which include elements such as inferences regarding your preferences or other characteristics (e.g., cooking enthusiast, travel, food and dining)</i></p>	<ul style="list-style-type: none"> • Directly from you • From cookies and similar technologies • From third-party sites and apps, content distribution channels and platforms • From third-party data suppliers and business partners • From social media platforms and similar services 	<ul style="list-style-type: none"> • To provide you with and to improve the Digital Services • To communicate with you • For advertising and marketing purposes for us or third-parties, including interest-based advertising • To protect our or others' rights 	<ul style="list-style-type: none"> • With affiliates and subsidiaries • With service providers • With advertising and marketing service providers and partners • With content measurement companies • With social media platforms • With business partners • With government authorities as required by law or as necessary to protect our rights
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Your California Consumer Privacy Act of 2018 (CCPA) Privacy Rights

Residents of California may have the following rights:

1. Right to know and access your personal information. Under CCPA, you have the right to:

- Know the categories of personal information we collect and the categories of sources from which we got the information;
- Know the business or commercial purposes for which we collect and share personal information;
- Know the categories of third parties and other entities with whom we share personal information; and
- Access the specific pieces of personal information we have collected about you.

To do so, please **complete the form available at ccpa.hearstmags.com**

(<https://ccpa.hearstmags.com>) and include your name, email address, California postal address as well as your subscription account number, if you have an active subscription.

You may also exercise your right by calling **1-800-659-7156 (tel:+18006597156)**.

2. Right to deletion. In some circumstances, you may ask us to delete your personal

information. To do so, please **complete the form available at ccpa.hearstmags.com** (<https://ccpa.hearstmags.com/>) and include your name, email address, California postal address as well as your subscription account number, if you have an active subscription. You may also exercise your right by calling **1-800-659-7156 (tel:+18006597156)**.

3. Right to opt out of sales. We may share your personal information with third parties in ways that may constitute a "sale" under CCPA. You may request that we not "sell" your personal information on a going forward basis. To do so, please **complete the Do Not Sell My Personal Information form available at optout.hearstmags.com** (<https://optout.hearstmags.com/>) and include your name, email address, California postal address as well as your subscription account number, if you have an active subscription, and credit card information, if selecting the U.S. Ads Free option. You may also exercise your right by calling 1-800-659-7156. ***If you reengage with us after opting out of the "sale" of your personal information, such as by ordering a new subscription, buying a product, signing up for a newsletter and/or entering a sweepstakes or contest you acknowledge that your personal information may be used and shared in accordance with this Privacy Notice, including in ways that may constitute a "sale" under CCPA.***

4. Right to be free from discrimination. You may exercise any of the above rights without fear of being discriminated against. We are permitted to provide a different price or rate to you if the difference is directly related to the value provided to you by your data.

We use the information you provide to make your CCPA rights requests to verify your identity, locate the personal information we may hold about you and act upon your request. We strongly recommend that you submit the email and postal address that you used when you created accounts, ordered subscriptions or signed up for a newsletter.

After you submit a CCPA rights request, you will be required to verify access to the email address you submitted. You will receive an email with a follow-up link to complete your email verification process. You are required to verify your email in order for us to proceed with your CCPA rights requests. Please check your spam or junk folder in case you can't see the verification email in your inbox. If you are a California resident and have any questions regarding your CCPA rights under this Privacy Notice, please contact us at ccpamagsrequests@hearst.com (<mailto:ccpamagsrequests@hearst.com>).

To view our CCPA request statistics, please visit our **CCPA Statistics page** (<https://www.hearst.com/us-magazines-CCPA-Statistics>).

Authorized Agents

For any of the CCPA rights, you may designate an authorized agent to make a request on

your behalf. In the request, you or your authorized agent must provide information sufficient for us to verify the identity of your agent and that your agent has been properly authorized to act on your behalf; this may take additional time to fulfill your request. If you are an authorized agent working on behalf of a consumer, you will need to fill out the relevant CCPA request form listed above on behalf of the consumer with the consumer's information. Please note that the consumer you are working on behalf of must have a California postal address and will need to verify access to the email account used to submit the CCPA request in order for us to move forward with processing the request.

Minors

We do not knowingly collect or disclose personal information of minors under the age of 16, without affirmative authorization.

Minors' Right to Request Deletion of User-Posted Comments

If you are a California resident and registered user on Seventeen.com or Seventeen mobile app and posted comments, content or other information on that site or app when you were under 18 years old, you may request deletion of those comments, content or other information by contacting us at magsprivacy@hearst.com (<mailto:magsprivacy@hearst.com>) and indicate in the subject line "California take-down request." You must provide us with the live URL where the content resides, a copy of the content you would like deleted (cut and pasted into your email), the date of publication, and - if applicable - the username associated with it. We will remove the posting (except as permitted or required by law). Note that our deletion does not ensure complete or comprehensive removal of your content from the internet and comments that may have been posted by others about you or your posting will remain accessible online.

Your Shine the Light California Rights (CA Civil Code § 1798.83)

You may also have the right to request a list of third parties to which certain personal information (as defined by California Civil Code § 1798.83) obtained through a Digital Service was disclosed by Hearst during the preceding year for those third parties' direct marketing purposes. If you are a California resident and want such a list, please contact us at Office of General Counsel, Attn: Privacy, 300 West 57th Street, New York, NY 10019. For such request, you must put the statement "Your California Privacy Rights" in the body of your request, as well as your name, street address, city, state, and zip code. In your request, you need to attest to the fact that you are a California resident and provide a current California address for our response. Please also indicate in your request the name of the Digital Service to which your request applies. Please note that we will not accept requests via the telephone, email, or by facsimile, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

O. ADDITIONAL INFORMATION FOR EUROPEAN VISITORS

In order to address our legal obligations in Europe (including the UK), Hearst provides the following additional information for Europe-based visitors to Hearst's U.S. Digital Services.

Who is Responsible for Your Information?

If you use or interact with a Hearst U.S. Digital Service then the data controller will be Hearst Magazine Media, Inc. (except with respect to Car and Driver and Road & Track, for which U.S. Digital Service the data controller will be Hearst Autos, Inc.). The contact details for this entity are provided in the "Contact Us" section above.

Legal Bases for Using Your Information

We process personal information for different purposes (as described in the "How We Use Information We Obtain" section, above) on the following legal bases:

To perform our contractual obligations to you. We and our service providers process your information to perform our contractual obligations to you when we use your information to provide you with the Digital Services and related content, products or services and to communicate with you. For example, when you purchase a subscription from us, we process your payment and contact information as necessary to confirm the subscription and we process your contact information and other details to provide you with support services you request. We also send you informational communications on this basis, including to confirm a subscription or to notify you of a change to a Digital Service. Failure to provide requested information could prevent or delay the fulfilment of our contractual obligations.

- **To pursue our legitimate interests.** We process your information to meet our legitimate interests when we use your information to provide you with the Digital Services and related content, products or services, to communicate with you and for our advertising and marketing purposes. For example, our legitimate interests include making improvements to, customizing and understanding how you interact with the Digital Services and related content, products or services, and sending you communications about products and services we think may be of interest to you. To accomplish our legitimate interests, we may share your information with our affiliates and subsidiaries, service providers and business partners (including for our advertising and marketing purposes) and in the context of a corporate transaction. We maintain safeguards to protect the information we process to pursue our legitimate interests.

To comply with our legal obligations. We process and share your information as necessary to comply with our legal obligations when we use your information to protect our rights or the rights of others and when we share your information with other parties where required

by law or as necessary to protect our rights. For example, we are required to collect certain information from you when processing your subscription payment for tax or financial reporting reasons.

- **With your consent.** We obtain your consent to process your information when we are required to do so by law. If consent is the legal basis on which we process your personal information, you can withdraw your consent at any time by contacting us using the information provided in the "Contact Us" section above.

Your Rights Over Your Information

In certain circumstances, you have a right to access or object to the use of personal information held about you (including in relation to direct marketing). You can also ask us to rectify, update, erase, restrict or to share your information in a usable format with another company. Such requests are subject to applicable law.

We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate.

If you would like to discuss or exercise such rights, please contact us at datarequestsmagazines@hearst.com (<mailto:datarequestsmagazines@hearst.com>). We will contact you if we need additional information from you in order to honor your requests.

Storing Your Information

We will keep your personal information for as long as we have a relationship with you. Once our relationship with you has come to an end, we will retain your personal information for a period of time that enables us to:

- Maintain business records for analysis, understanding market trends and/or audit purposes and to improve the Digital Services.
- Comply with record retention requirements under applicable laws or other relevant legal or regulatory requirements.
- Defend, establish, exercise or bring any existing or potential legal claims.
- Carry out fraud detection and prevention.
- Deal with any complaints regarding the Digital Services, our products and services.

We will delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete from our systems, we will put in place appropriate measures to prevent any further processing or use of the data.

International Data Transfers

Information collected through the Digital Services will be processed in and subject to the laws of the United States, which may not provide the same level of protection for your personal information as your home country. If we transfer personal data from the European Economic Area, United Kingdom and Switzerland we put in place safeguards. In particular, such safeguards include the European Commission-approved standard contractual clauses. For more information on these safeguards, please contact us at the details provided in the "Contact Us" section above. We participate in the EU-US and Swiss-US Privacy Shield frameworks. Read our **Privacy Shield Statement** (<https://www.hearst.com/-/privacy-shield-statement>) to learn more.

Changes to the Privacy Notice

Where changes to this Privacy Notice have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you advanced notice so that you have the opportunity to exercise your rights (e.g. to object to the processing).

Privacy Officer and Complaints

Our Privacy Officer can be contacted at magsprivacy@hearst.com (<mailto:magsprivacy@hearst.com>).

We are committed to working with you to obtain a fair resolution in the event you have a complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to a data protection authority.

EXHIBIT 77

The Wayback Machine - <https://web.archive.org/web/20200603161748/https://www.journalofaccountancy.com/info/...>

This site uses cookies to store information on your computer. Some are essential to make our site work; others help us improve the user experience. By using the site, you consent to the placement of these cookies. Read our [privacy policy](https://web/20200603161748/https://www.journalofaccountancy.com/info/privacy-policy.html) ([/web/20200603161748/https://www.journalofaccountancy.com/info/privacy-policy.html](https://web/20200603161748/https://www.journalofaccountancy.com/info/privacy-policy.html)) to learn more.



Journal of Accountancy

Association of International Certified Professional Accountants Privacy Policy

Effective June 4, 2019

Version 3

Overview

Our mission is to drive a dynamic accounting profession globally and, when you register with us, you gain access to a wide range of tools and services to stay ahead. To seamlessly deliver these resources and benefits, we at times need to share your information across our teams and offices – always with a focus on keeping your data secure.

This Privacy Policy describes the ways in which your personal data is collected and used by the Association of International Certified Professional Accountants (the Association), the Chartered Institute of Management Accountants (CIMA), and the American Institute of CPAs (AICPA) (collectively referred to herein as “the controllers”, “we”, “us”, “our”). By providing your personal data to any of the controllers, you acknowledge and agree that your data may be shared between and/or processed by any of the three controllers.

It is your responsibility to review and understand this Privacy Policy prior to providing your personal data to us. You also should review our [Terms and Conditions](https://web.archive.org/web/20200603161748/https://www.aicpa-cima.com/terms-and-conditions.html) (<https://web.archive.org/web/20200603161748/https://www.aicpa-cima.com/terms-and-conditions.html>). If you do not accept and agree to the Privacy Policy and/or [Terms and Conditions](https://web.archive.org/web/20200603161748/https://www.aicpa-cima.com/terms-and-conditions.html) (<https://web.archive.org/web/20200603161748/https://www.aicpa-cima.com/terms-and-conditions.html>), please refrain from providing your personal data to us, accessing our websites, and/or utilizing our products and services.

With our websites and services constantly evolving, our Privacy Policy and [Terms and Conditions](https://web.archive.org/web/20200603161748/https://www.aicpa-cima.com/terms-and-conditions.html) (<https://web.archive.org/web/20200603161748/https://www.aicpa-cima.com/terms-and-conditions.html>) may also change from time to time. Whenever there are changes, the modified policies will be posted on our websites and will be effective at that time. Each time they change, the version number displayed at the top of the page also will change. Consequently, each time you access or use our websites or otherwise engage with us, you accept and agree to the most current Privacy Policy and set of [Terms and Conditions](https://web.archive.org/web/20200603161748/https://www.aicpa-cima.com/terms-and-conditions.html) (<https://web.archive.org/web/20200603161748/https://www.aicpa-cima.com/terms-and-conditions.html>). It is your responsibility to be aware of any such changes.

Notice

Our websites contain links to other websites which are managed by third parties (including their use of cookies).

As a user of links, it is your responsibility to understand those third parties' privacy policies. Once you leave our websites using links, we have no control over information that is submitted to or collected by any third parties and are not responsible for other websites.

Collection of Personal Data

In order to provide our products, services and websites and for the other purposes set out in **Use of Information** below, we collect and process personal data from our members, students, customers, and other users of our websites, products and services. We may collect information from you such as, but not limited to, your name, email address, mailing address, phone/fax numbers, date of birth, gender, payment information, education history, employment information, information related to your professional qualifications, designations and memberships and information about your use of our and third-party websites, products and services ("**Personal Data**"). You are not required to provide us with all of the Personal Data listed above, but if you do not do so, we may not be able to effectively provide you with our products, services and information. In certain circumstances, you will need to provide us with specific categories of Personal Data (including name, email address and payment information) in order to enter into a contract with us and for us to perform that contract.

From time to time and as permitted by applicable law(s), we may collect Personal Data about you and update any existing Personal Data that we currently hold from other third-party sources, including publicly available data sources, publicly available social networking sites such as LinkedIn, your employer or university/school, State CPA Societies, our credential and designation examination providers, course providers or data brokers such as Acxiom.

See "Use of Information" section below for details regarding the ways that we use and process your personal data.

Use of Information

Your Personal Data may be used in the following ways:

- To provide our products and services to you
- To enhance and improve our products and services, for example, by performing internal research, analyzing user trends and measuring demographics and interests
- To process payments from you (including, but not limited to, membership dues and subscriptions, registration fees, voluntary contributions, examination fees, credential and designation fees, or payments for any products or services that you choose to purchase from us)
- To process payments to you (including, but not limited to, refunds or reimbursements)
- Internal purposes, such as website and system administration or internal audits and reviews
- To provide access to restricted parts of our websites.
- To determine eligibility for membership, credentials, designations and volunteer opportunities
- To communicate with you regarding your membership and products/services that may be of interest to you
- To respond to your requests and inquiries

- To serve relevant advertisements to you when you visit our sites or other third-party sites (including social media platforms)
- To request your participation in surveys, focus groups, or other initiatives which help us to gather information used to develop and enhance our products and services
- To evaluate your performance on continued learning courses and assist you in the tracking of your progress
- For examination scheduling, administration and registration purposes
- To comply with applicable law(s) (for example, to comply with a search warrant, subpoena or court order) or to carry out professional ethics/conduct investigations
- From time to time we may provide statistics about the usage levels of the Site and other related information to reputable third parties, but these statistics will not include information which will allow you to be identified
- We may use the information you provide to us and which we obtain from other sources to better understand your interests so we can try to predict what other products, services and information you might be most interested in. This practice is called “profiling”, which involves making automated decisions about you based on this information in order to better enable us to tailor our interactions with you to make them more relevant and interesting. You may object to such profiling at any time by contacting us (see **Contact Information/User Rights** below).

We will process your Personal Data for the purposes identified above on the following bases:

1. Our legitimate interests, which include processing such Personal Data for the purposes of providing and enhancing the provision of our products, services and information, as well as advertising further products, credentials, designations, services and information to you;
2. Where such processing is necessary to perform our contract with you or to take steps before entering into our contract with you; and
3. As necessary to comply with our legal obligations, resolve disputes and enforce our contractual agreements.
4. Where such processing is necessary to comply with our obligations to protect members of the public and the public interest, including but not limited to, the maintenance of a member and student directory, regulatory activities and disciplinary actions.

Unless a longer retention period is required by applicable law, we will retain your information for as long as your account is active, as well as for a short additional period afterwards to cover any outstanding issues or queries that may arise in relation to your account (for example, outstanding payments). This period of retention is subject to our review and alteration.

Sharing and Disclosure to Third Parties

We may disclose your Personal Data to third parties from time to time under the following circumstances:

1. You request or authorize the disclosure of your personal details to a third party.

2. The information is disclosed as permitted by applicable law(s) and/or in order to comply with applicable law(s) (for example, to comply with a search warrant, subpoena or court order).
3. The information is disclosed to your employer, university or tuition provider in the event they have an interest in your data (e.g. they support your exam, tuition, or membership fees).
4. The information is provided to our agents, vendors or service providers who perform functions on our behalf. See below for additional details.

It is likely that the identity and categories of such third parties will change during the life of your account but, depending on your use of the Site, it is anticipated that your Personal Data will be disclosed to the following categories of third-party service providers who perform functions on our behalf. We require that our third-party service providers only use your Personal Data as necessary to provide the requested services to us and each service provider is subject to a set of terms consistent with this Privacy Policy.

- Hosting providers for the secure storage and transmission of your data
- Learning technology and online event providers for the delivery and improvement of web events and learning programs and the tracking of your progress
- Digital credential providers for the delivery of digital badges earned through your participation in learning programs
- Examination providers for the scheduling and delivery of credential and designation examinations
- Identity management providers for authentication purposes
- Database software providers for the management and tracking of your data
- Legal and compliance consultants, such as external counsel, external auditors, or tax consultants
- Advertising partners, including social media providers, for the delivery of targeted advertisements
- Marketing providers who send communications on our behalf regarding our products and services
- Payment solution providers for the secure processing of payments you provide to us
- Publishers and learning providers who develop products on our behalf
- Technology providers who assist in the development and management of our web properties
- Outbound call center providers, who may perform outreach on our behalf regarding our products and services
- Fulfillment and postal vendors for the fulfillment of our products and services
- Our volunteers or committee members who perform various functions on our behalf

Survey and research providers who perform studies on our behalf

Collection of Information Through Cookie Use

We may obtain information about your general internet usage by using a “cookie” file. A cookie is an element of data that a website can send to your browser, which may then be stored on your hard drive. If you do not agree, you can choose to not receive a cookie file by enabling your web browser to refuse cookies or to prompt you before you accept a cookie.

The following types of cookies may be used on our websites:

1. Essential Cookies: These cookies are necessary for our websites to work properly. They are usually only set in response to actions you take such as logging in or completing online forms. You can set your browser to block or alert you about these cookies, but some parts of our sites will not function if these cookies are blocked.
2. Functionality Cookies: These cookies enhance the functionality of our websites by storing your preferences (such as your preferred language or the region that you are in) and allow us to provide enhanced features on our sites such as videos. These cookies may be set by us or by third-party content that we have placed within our pages. If you do not allow these cookies, some of the features on our websites may not function properly and you may not receive a personalized experience when visiting our sites.
3. Performance Cookies: These cookies allow us to count page visits and traffic sources so we can measure and improve the performance of our sites. They help us to understand which pages are visited most frequently and how visitors interact with our sites. Any information collected by performance cookies is aggregated and therefore not identifiable. If you do not allow these cookies we will not receive data related to your visits to our sites.
4. Third-Party Cookies: These cookies may be set through our site by our advertising partners, such as Google or Adobe. They may be used by these companies to enable them to build a profile of your interests and show relevant advertisements on other sites. These cookies are based on identifying your browser and internet device. If you do not allow these cookies, you will experience a decrease in the targeted advertisements that you see online.

If you opt in to use the “Remember me” feature on our websites, we will place a persistent cookie on your hard drive and you will not be required to log in for every session. By disabling cookies on your machine or clearing your browsing history you may deactivate the persistent cookie.

All major browsers allow you to block or delete cookies from your system. To learn more about your ability to manage your preferences related to cookies, please consult the privacy features within your browser.

Further information about cookies:

- [How to manage your preferences related to targeted advertising](https://web.archive.org/web/20200603161748/http://optout.networkadvertising.org/#/) (<https://web.archive.org/web/20200603161748/http://optout.networkadvertising.org/#/>)

Communication Preferences

We strive to provide you with relevant and useful information related to our products, services and industry news. You can update your communication preferences at any time by visiting the preference center within your online account on our website(s). Additionally, you can contact us using the information listed at the bottom of this policy

to make changes to your communication preferences. Any promotional emails that we send will include a link at the bottom of the email to unsubscribe.

If you have opted in to receive text messages from us, you can opt out at any time by responding with the word **STOP**. You will receive a confirmation text of your choice to opt out.

Transfer of personal data internationally

By providing us with your personal data, you acknowledge and agree that we may from time to time transfer any of your personal data to any of our offices or to the offices of any of our affiliates, agents or appointed representatives located around the world. We have implemented appropriate safeguards for transfers of personal information originating from the European Economic Area (EEA) to countries located outside of the EEA. These safeguards include implementing standard data protection clauses which have been approved by the European Commission or (in relation to transfers from the European Union to the USA) transferring Personal Data to entities who have signed up to the EU-U.S. Privacy Shield (<https://web.archive.org/web/20200603161748/https://www.privacyshield.gov/welcome>). Please do not submit any personal data to us if you do not wish for your data to be transferred internationally.

Security and Other

We use reasonable measures to strive to safeguard and secure the personal data we collect. Any transmission of personal information is at your own risk. Technology, such as, but not limited to, Transport Layer Security (TLS) and Secured Socket Layer (SSL), is used to enhance security and reduce risk of loss. Our security practices, processes or technology do not guarantee absolute security of your information and you should take all normal personal precautions such as, but not limited to, not sharing passwords, closing browsers, and not using public networks (e.g., internet cafes, etc.).

Parents and Children

We do not knowingly collect personal information from children under the age of 13. Parents have the right to terminate the registration of a child under the age of 13 by contacting us using the information listed at the bottom of this policy.

Subject Access/User Rights

As a user, you are subject to the following rights:

- The right to be informed of the use of your Personal Data
- The right to access and/or to require the correction or erasure of your Personal Data
- The right to block and/or object to the processing of your Personal Data
- The right to not be subject to any decision based solely on automated processing of your Personal Data
- In limited circumstances, you may have the right to receive Personal Data in a format which may be transmitted to another entity.
- If you have a complaint in relation to the processing of your data carried out under this Privacy Policy, you have the right to lodge a complaint with your local supervisory authority. If you are located in the European Union, you can find the details of your local supervisory authority here (<https://web.archive.org/web/20200603161748>)

[/http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm](http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm)).

You may seek to exercise any of these rights by updating your information online (where possible) or by sending a written request to our Data Protection Officer using the contact details listed below:

Jonathan Mabe, Data Protection Officer
Association of International Certified Professional Accountants
220 Leigh Farm Rd.
Durham, North Carolina 27707
SecurityandPrivacyOffice@aicpa-cima.com

Contact Information

You are encouraged to report any improvements, suggestions, or any suspected breaches of privacy or security to us by using the contact information listed below.

Association of International Certified Professional Accountants Contact Information:

Chartered Institute of Management Accountants
The Helicon
One South Place
London
EC2M 2RB
United Kingdom
P: +44 (0)20 8849 2251
Hours of Operation:
(9am – 5pm, UK time, M-F)
Email: cima.contact@cimaglobal.com

American Institute of CPAs
220 Leigh Farm Road
Durham, NC 27707
P: 1.888.777.7077
F: 1.800.362.5066
Hours of Operation:
(9am – 6pm, ET, M-F)
Email: service@aicpa.org (<https://web.archive.org/web/20200603161748/mailto:service@aicpa.org>)

EXHIBIT 78

Fast & free store pickup! [details](#) Spend your Kohl's Cash® now. [details](#) Get 15% off when you sign up for emails. [details](#)

KOHL'S

What are you looking for today?



Account

0

\$0.00



Check Out

Shop by Category

★ My Store: Downey

Kohl's Card

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Help

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KOHL'S PRIVACY POLICY - YOUR PRIVACY RIGHTS

Effective Date: Feb 18, 2022

SCOPE

This Privacy Policy describes how Kohl's, Inc., its affiliates and its third-party service providers treat customer personal information on the websites and apps where this Privacy Policy is located. In this Privacy Policy we call websites, emails and apps "Platforms." And when we say "Kohl's" or "we", we mean us, our affiliates, and relevant third-party service providers. This Privacy Policy also applies to how we treat personal information collected in Kohl's retail stores ("Stores"), Kohl's operated retail outlet locations and other locations and events operated by Kohl's or its affiliates. This Privacy Policy does not apply to information provided directly to our banking partner, which offers the Kohl's Card credit card.

To view the separate Kohl's Card credit card Privacy Policy that describes how our banking partner uses your information in connection with the Kohl's Card credit card, please click [here](#).

By using the Platforms and shopping in our Stores, you agree to the terms of this Privacy Policy.

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TYPES OF PERSONAL INFORMATION WE COLLECT

When information identifies or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household, we refer to it as "personal information." Kohl's collects personal information from you and about you. This may include:

- **Identifying Information.** For example, we may collect your name, unique personal identifier, online identifier, mailing address, email address, postal address and telephone number, including your mobile phone number.
- **Commercial and Payment Information.** For example, we may collect your credit card number and billing address. We may also collect information about the products or services purchased, obtained, considered or returned, as well as other purchasing or consuming histories, behaviors or tendencies.
- **Social Media Information.** We may collect information you post on our social media pages. We may also collect your social media profile information.
- **Event Information.** For example, we may collect the date and location of an event you are registered for.
- **Information You Post or Submit.** For example, we may collect information when you contact us through the "Live Chat" feature on our site. We may also collect information submitted in connection with creating an account, completing an application, placing an order or making a purchase, including bank account numbers or other financial information. We may collect information you post in a public space on our site. This may include our Ratings & Reviews feature.
- **Demographic Information.** For example, we may collect your age, gender and zip code.
- **Driver's License Information.** To the extent permitted by applicable law, we may collect your driver's license information. For example, we may collect this information if you return an item without a receipt.
- **Device Information.** For example, we may collect the type of device you use to access our Platforms. It may also include your device identification number, browser, IP address or mobile operating system.
- **Location Information.** For example, we may collect precise location information from your device. This may include your in-store location. For more information about your choices related to location information, see the [Choices](#) section below.
- **Internet or other Network Activity Information.** For example, we may collect information related to your browsing history, search history and other information regarding your interactions with our Platforms or advertisements, including, without limitation, actions you perform (e.g. clicks, mouse movements, keystrokes, entering and submitting information) on the Site.
- **Usage Information.** We may look at how you interact with the Platforms. If you use our app, we may look at how often you use the app and where you downloaded it.
- **Biometric Information.** If you visit our stores, we may capture audio, electronic, visual, thermal or similar information with our surveillance equipment.
- **Inferences.** We collect profile inferences that we draw from your information and web activity to create a personalized profile so we can better identify goods and services that may be of interest.

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HOW WE COLLECT YOUR PERSONAL INFORMATION

Kohl's collects personal information in different ways and from different sources.

Directly From You. For example, when you:

- Make a purchase in our Stores (including in our partner-branded stores inside Kohl's Stores, such as *Sephora at Kohl's*) or on our Platforms.
- Make a return or exchange.
- Purchase an electronic gift card.
- Create a personalized Kohls.com shopping account.
- Track an order online.
- Sign up to receive promotional emails or text messages (including offers and sales alerts).
- Sign up to join a loyalty, rewards or similar program or club.
- Provide your contact information to our beauty associates.
- Participate in one of our promotional sweepstakes, contests, surveys or focus groups.
- Create or update a gift registry.
- Use the Ratings & Reviews or related services and features.
- Submit a request to our Customer Service team.
- Sign up for, and/or maintain, a Kohl's Charge card.
- Connect your social media account to the Platforms.
- Interact with Kohl's social media pages.

Passively. For example, when you:

- Install and use Kohl's mobile apps.
- Visit and navigate Kohl's Platforms on any device.
- Enable location-based features on our Platforms.
- Click on sponsored links or third-party advertisements.
- Use the Wi-Fi Services provided in some Stores.
- Visit Stores; Kohl's uses cameras in and around its Stores for security, operational and other business purposes such as understanding customer behavior and patterns.
- Receive or interact with Kohl's communications and Platforms that may contain cookies or pixels.

From Third Parties. We may receive information about you from other sources. For example, this may include receiving information from:

- Our business partners, including online advertising networks and companies that co-sponsor our promotions.
- Social media platforms, including Facebook, Twitter, YouTube, Pinterest and Instagram.
- Trusted third party sources, such as our service providers, data analytics companies, and tracking technologies to better provide and customize the Platforms for you.
- Companies that provide information to supplement what we already know about you, including data brokers.

By Combining Information. For example, we may:

- Combine information that we collect in our stores with information we collect through our Platforms.
- Combine information we collect about you from the different devices you use to access our Platforms.
- Combine information we get from third parties with information we already have about you.

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HOW WE USE YOUR PERSONAL INFORMATION

Examples of how we may use your personal information include:

Business Purposes:

- **To Provide Our Products and Services.** This could include fulfilling your requests for products or services. It could also include processing purchases or return transactions.
- **To Improve Our Products and Services.** We may use your information to make our Platforms and stores better. We may also use your information to customize your experience with us.
- **To Understand Your Interests.** For example, we may use your information to better understand what products interest you based on information we collect about you and your household.
- **To Respond to Your Requests or Questions.** This may include responding to your customer feedback.
- **To Communicate With You.** We may communicate with you about your account or our relationship. We may also contact you about this Privacy Policy or our Platform Terms & Conditions, including material changes to this Privacy Policy, Platform Terms & Conditions or programs in which you may be enrolled.
- **For Security Purposes.** This could include protecting our company and our customers, including providing notifications to customers of any security incidents related to personal information. It may also include protecting our Platforms.

Commercial Purposes:

- **For Marketing Purposes.** We may provide you with information about new products and special offers. We may use your information to serve you ads about products and offers on our Platforms or on third-party websites and networks. We may tell you about new features or updates. These might be third-party offers or products we think you might find interesting. For more information about your choices related to these communications, see the [Choices](#) section below.
- **To Send Push Notifications.** If you use our mobile apps, we may send you push notifications about new products or special offers.

Additional Purposes:

- **Aggregate or Anonymous Non-Personal Information.** We may also use aggregate or anonymous (de-identified) information and share such information with third parties for their marketing or analytics uses. Such information does not contain personal information.
- **As Otherwise Permitted By Law or As We May Notify You.** We may also use information you provide to us for other purposes as disclosed at the time you provide your information or otherwise with your consent.

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HOW WE SHARE YOUR PERSONAL INFORMATION

Information Shared By You

Your activity in connection with the Platforms, such as your posts on our Ratings & Reviews feature or content you choose to share on your event registry, may be visible to other users of the Platforms and in some cases, publicly available. Please exercise caution when disclosing information in public areas. If you provide any information to a third party while using our Platforms, the third party's privacy policy will apply to that information.

Information Shared By Us

We may share your information in the following ways:

- **Internally.** We may share your information within the Kohl's family of companies. This includes our affiliates.
- **With Our Service Providers.** We may share your information with third parties who perform services on our behalf. For example, this may include merchandise vendors and payment processors. It may also include companies that send emails on our behalf.
- **With Our Business Partners.** For example, this may include third parties that provide financial products and services related to our business, including Kohl's Card credit card. It may also include sharing limited data with partners that have a branded store inside our Stores (such as *Sephora at Kohl's*) to facilitate your purchase and participation in a loyalty program you may have with such partner. It may also include a third party that co-sponsors a contest or promotion.
- **With Third Parties for Marketing Purposes.** This may include third parties in whose products or services we believe you may be interested. These third parties may also share your information with others. These third parties may use your information for their own marketing purposes or the marketing purposes of others. This may include the delivery of interest-based advertising, which serves you advertisements based on your interests and activities on the internet.
- **With Any Successors to All or Part of Our Business.** For example, if Kohl's merges with, acquires or is acquired by another business entity. This may include an asset sale, corporate reorganization or other change of control.
- **To Comply With the Law or To Protect Ourselves.** For example, this could include responding to a court order or subpoena. It could also include sharing information if a government agency or investigatory body requests. We may share information when we are investigating a potential fraud. This could include fraud we think has occurred during a sweepstakes or promotion. We may also share information if you are the winner of a sweepstakes or other contest with anyone who requests a winner's list.
- **For Other Reasons We May Describe to You.** We may also share your information for other purposes as disclosed at the time you provide your information or otherwise with your consent.

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YOUR CALIFORNIA PRIVACY RIGHTS

Notice of Collection of Personal Information:

Kohl's collects personal information as described above under "Types of Personal Information We Collect" for the business and commercial purposes described above under "How We Use Your Personal Information." California residents can find out more information about their privacy rights below, including a description of California residents' right to opt out (further explained, below, and linked [here](#)).

Access and Deletion Rights

If you reside in California, then you have the following rights:

You have the right to request us to disclose to you, no more than twice in a 12-month period, the personal information about you that Kohl's collects, uses, discloses, and sells during the preceding 12 months, which shall include as follows:

- I. The categories of personal information that we've collected and sold about you, or shared for a business purpose with our service providers.
- II. The sources from which we collected such information.
- III. The third parties with whom we've shared that personal information and to whom we've sold that personal information.
- IV. The business or commercial purpose for collecting or selling that personal information.
- V. The specific pieces of personal information we've collected about you.

You also have the right to request that we delete any personal information that we have collected from or about you. Note that there are some reasons we will not be able to fully address your request, such as if we need to complete a transaction for you, to detect and protect against fraudulent and illegal activity, to exercise our rights, for our internal purposes, or to comply with a legal obligation.

To take advantage of these access or deletion rights, please contact us by email at privacy@kohls.com, by phone at 855-219-9265, or by visiting the link listed in the How to Contact Us section. We may request certain information to verify your identity before we can respond to your access and deletion requests. We will confirm receipt of your request within 10 business days and will respond to your request within 45 calendar days, after proper verification, unless we need additional time, in which case we will let you know.

We will not discriminate against you because you exercised your rights under this section of the Privacy Policy.

Categories of Personal Information Disclosed

As relevant to the requests noted above, in the last 12 months, we have disclosed the following categories of personal information for a business purpose (such as with our service providers who are restricted from using your personal information outside the scope of their services for us):

- Identifying Information, disclosed to our Service Providers, such as billing service providers, email/SMS service providers, and customer service and intelligence platforms;
- Commercial and Payment Information, disclosed to our Service Providers, such as billing service providers, customer service and intelligence platforms, network security and fraud protection services, and campaign optimization service providers, and to another business at your direction (such as to facilitate your purchase and participation in a loyalty program at a branded store within our Stores, such as *Sephora at Kohl's*);
- Event Information, disclosed to our Service Providers, such as email/SMS service providers, customer service and intelligence platforms, and campaign optimization service providers;
- Demographic Information, disclosed to our Service Providers, such as billing service providers, email/SMS service providers, and customer service and intelligence platforms;
- Device Information, disclosed to our Service Providers, such as network security and fraud protection services, campaign optimization service providers, and cloud data storage providers;
- Location Information, disclosed to our Service Providers, such as email/SMS service providers, customer service and intelligence platforms, network security and fraud protection services, campaign optimization service providers, and cloud data storage providers;
- Internet or other Network Activity Information, disclosed to our Service Providers, such as customer service and intelligence platforms, network security and fraud protection services, campaign optimization service providers, and cloud data storage providers;
- Usage Information, disclosed to our Service Providers, such as billing service providers, email/SMS service providers, customer service and intelligence platforms, network security and fraud protection services, campaign optimization service providers, and cloud data storage providers; and
- Inferences from the above, disclosed to our Service Providers, such as billing service providers, email/SMS service providers, customer service and intelligence platforms, network security and fraud protection services, campaign optimization service providers, and cloud data storage providers

Opt-Out Requests

In addition to access and deletion rights, you may request to opt out of the sale of your personal information to third parties, and to our affiliated companies that do not share the same brand name, for their commercial use. This means that, if you opt out, going forward, we will not share your personal information with such third parties to use for their purposes unless you later direct us to do so. To effect the opt out, please click on the Do Not Sell My Personal Information link [here](#), which also is on our website footer.

To learn more about submitting a request under this section of the Privacy Policy, please see the [How to Contact Us](#) section, below.

Categories of Personal Information Sold

As relevant to opt out rights, in the last 12 months, we have sold the following categories of personal information:

- Identifying Information, sold to our Business Partners and Third Parties for Marketing Purposes, such as with data analytics providers, and social media platforms;
- Payment and Commercial Information, sold to Business Partners and Third Parties for Marketing Purposes, such as with data analytics providers, and social media platforms;
- Device Information, sold to Business Partners and Third Parties for Marketing Purposes, such as with internet service providers, data analytics providers, and social media platforms;
- Location Information, sold to Business Partners and Third Parties for Marketing Purposes, such as with internet service providers, data analytics providers, and social media platforms; and
- Internet/Network Activity, sold to Business Partners and Third Parties for Marketing Purposes, such as with internet service providers, data analytics providers, and social media platforms.

We do not knowingly sell personal information about persons under the age of 16.

Agent Requests

You may authorize someone to make a privacy rights request on your behalf (an authorized agent). Authorized agents will need to demonstrate that you've authorized them to act on your behalf, and that they are registered with the California Secretary of State to conduct business in California, or must demonstrate they have power of attorney pursuant to applicable probate law. We retain the right to request confirmation directly from you confirming that the agent is authorized to make such a request, or to request additional information to confirm the agent's identity. An authorized agent is prohibited from using a consumer's personal information, or any information collected from or about the consumer, for any purpose other than to fulfill the consumer's requests, for verification, or for fraud prevention.

Information on Requests Received During Prior Calendar Year

During the prior calendar year, ending December 31, 2020, Kohl's received consumer requests pursuant to the rights described in this "Your California Privacy Rights" section of the Privacy Policy. Below are metrics reflecting the number of requests Kohl's received and Kohl's response to such requests.

Type of Request	Number of Requests that Kohl's:			Median Number of Days for Kohl's to Complete its Response
	Received	Honored (in whole or in part)	Unable to complete	
Request to Know or Access Personal Information	32	15	17 (denied for lack of identity verification)	36.96
Request to Delete Personal Information	520	95	425 (denied for lack of identity verification or documentation)	9.98
Request to Opt-Out of Sale of Personal Information	3483	2752	560 (incomplete Authorized Agent requests)	6.35

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NOTICE OF FINANCIAL INCENTIVE

Kohl's Rewards ("Kohl's Rewards") is our voluntary loyalty program. By joining Kohl's Rewards you will receive certain perks, including, but not limited to:

- **Kohl's Cash®** Earn 5%* Kohl's Rewards on qualifying purchases, which will be converted and issued into \$5 Kohl's Cash® increments on the first day of the following month, valid for 30 days (subject to Rewards terms/conditions).
- **Special Birthday Gift:** \$5 Kohl's Cash® awarded on the first day of your birthday month.
- **Personalized Perks:** Access to deals throughout the year, plus special offers.

Whether or not you participate in Kohl's Rewards, you are still eligible to earn Kohl's Cash® during a designated earn period (terms and exclusions apply), just not to the same degree. You also do not need a Kohl's Card credit card to join Kohl's Rewards.

You may un-enroll from the Rewards program at any time by contacting Kohl's Rewards Customer Service at 1-844-564-5704.

When you sign up for Kohl's Rewards, we typically ask you to provide your name, contact information (such as email address and telephone number), zip code, and birthday. Because we collect personal information, this may be interpreted as a "financial incentive" program under California law. The value of your personal information that we collect is reasonably related to the expenses related to the discounts and other perks that we offer to Kohl's Rewards members.

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CHILDREN UNDER 16

Our Platforms where this Privacy Policy is located are meant for adults. We do not knowingly collect personally identifiable data from persons under the age of 16, and strive to comply with the provisions of COPPA (The Children's Online Privacy Protection Act). If you are a parent or legal guardian and think your child under 16 has provided us with information, please contact us at privacy@kohls.com. You can also write to us at the address listed at the end of this website Policy. Please mark your inquiries "COPPA Information Request." Parents, you can learn more about how to protect children's privacy on-line [here](#) to view the FTC's guide to protecting your child's privacy online.

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SECURITY

The Internet is not 100% secure. We cannot promise that your use of our sites will be completely safe. We encourage you to use caution when using the Internet. We use reasonable means to safeguard personal information under our control. A user id and a password are needed to access certain areas of the Kohl's Platforms. It is your responsibility to protect your username and password.

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STORAGE OF INFORMATION

Information we maintain may be stored in the United States. If you live outside of the United States, you understand and agree that we may transfer your personal information to the United States. This site is subject to U.S. laws, which may not provide the same level of protections as those in your own country.

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LINKS

Kohl's Platforms may contain links to other third-party sites that are not governed by this Privacy Policy. If you click on a link to a third-party site, you will be taken to a site we do not control. We are not responsible

for the privacy practices used by third-party sites. We suggest that you read the privacy policies of those sites carefully. We are not responsible for these third-party sites.

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HOW TO CONTACT US

If you wish to contact us to update your information, please feel free to contact us by telephone at 866-887-8884.

If you wish to contact us to submit a request under the California Consumer Privacy Act of 2018, please feel free to contact us by telephone at 855-219-9265, by email at privacy@kohls.com or click [here](#).

You may also write to us at the following address:

Kohl's, Inc.
P.O. Box 3043
Milwaukee, Wisconsin 53201

If you have any questions, comments or concerns with respect to our privacy practices or this Privacy Policy, please feel free to contact us at privacy@kohls.com. This inbox may also be used for Nevada residents to submit a verified request to direct us to stop the sale of your covered information.

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CHOICES REGARDING YOUR INFORMATION

You have certain choices about how we use your information.

Email:

- Use the unsubscribe link on any Kohl's promotional emails.

Text Messages & Mobile Coupons:

- Follow the opt-out instructions provided in our text message or mobile coupon.

Mobile Application and Location Based Services:

- If you have previously opted into Kohl's collection and use of location-based information through our mobile application, you may opt-out by adjusting the Settings on your mobile device.
- You may opt-out of all location-based information collection on our mobile apps by uninstalling the Kohl's mobile application and refraining from using Kohl's Wi-Fi Services available in Stores.

Postal Mail:

- To be removed from our global marketing mailing lists, send your request, including your full name and mailing address, to

Kohl's, Inc.
PO Box 3120
Milwaukee, WI 53201

- Call Customer Service at (866) 887-8884

Cookies & Similar Technologies:

- To learn how we - and our vendors - use cookies and other tracking tools, and to read our **Do Not Track** policy, please click [here](#) to view our About Our Ads policy.

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CHANGES IN POLICY

From time to time, we may change our Policy. We will notify you of any material changes to our Policy as required by law. We will also post an updated copy on our Platforms. Please check our Platforms periodically for updates.

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SHOP KOHL'S

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| Get 15% off when you sign up for our emails | Gift Cards |
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| Diversity & Inclusion | Apply for Seasonal Jobs | Affiliate Program |

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Android, Google Play and the Google Play logo are trademarks of Google Inc. App Store is a service mark of Apple Inc.

[Kohl's Privacy Policy](#) - Your Privacy Rights | [Kohl's](#)
[Legal Notices](#), [Privacy Policy](#), [California Privacy Policy](#), [CA-Do Not Sell My Personal Information](#),
[About Our Ads](#), [California Transparency in Supply Chains Act](#).

EXHIBIT 79



Library of America

PRIVACY & TERMS

Library of America has created this statement in order to demonstrate our firm commitment to privacy. The following discloses the information gathering and dissemination practices for this website: www.loa.org.

INFORMATION AUTOMATICALLY LOGGED

We use your IP address to help diagnose problems with our server and to administer our website. Your IP address is also used to gather broad demographic information and to determine the number of unique visitors that the site receives.

COOKIES

Our site uses cookies to keep track of your preferences, and to serve you certain content (for example, surveys) a limited number of times. No identifiable personal information is ever stored in cookies used by this site.

ORDER FORMS

Our site uses an order form for customers to request information, products, and services. We collect contact information (e.g. email addresses), financial information (e.g. account or credit card numbers), and geographic information (e.g. zip codes). Library of America does not share its customers' phone numbers or e-mail addresses with any other company.

Contact information from the order forms is used to get in touch with the visitor when necessary.

Users may choose not to receive future mailings; see the choice/opt-out section below.

Financial information is collected to bill the user for any products and services ordered.

Profile data collected at our site are used to tailor the visitor's experience, with content displaying according to the visitor's preferences.

SURVEYS

Our online surveys may ask visitors for contact information (such as their email address).

Contact information from the surveys is used to get in touch with the visitor when necessary. Library of America does not share its customers' phone numbers or email addresses with any other company.

Users may choose not to receive future mailings; see the choice/opt-out section below.

EXTERNAL LINKS

This site contains links to other sites. Library of America is not responsible for the privacy practices or the content of such websites.

SECURITY

This site has security measures in place to protect the loss, misuse, and alteration of the information under our control. When you submit personal information to us (for example, if you subscribe to the series or use any of our online order forms) Secure Sockets Layer, v3 encryption is used to ensure that no one else on the Internet can view the information you have submitted.

CHOICE/OPT-OUT

Our site provides users the opportunity to choose not to receive promotional/marketing information from us.

To opt out of promotional/marketing emails from Library of America, please send a request to be removed from our list to lists@loa.org or send a request from our [Contact Us](#) page.

DATA QUALITY/ACCESS

This site gives users the following options for changing and modifying information previously provided.

To change or modify information previously provided to Library of America, please send a request for the information change(s) to lists@loa.org or send a request from our [Contact Us](#) page.

CONTACTING THE WEB SITE

If you have any questions about this privacy statement, the practices of this site, or your dealings with this website, please contact website@loa.org or send an inquiry from our [Contact Us](#) page.

EXHIBIT 80

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Partial PPP loan forgiveness remains if 60% threshold not met

By Jeff Drew
June 8, 2020

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Borrowers under the Paycheck Protection Program (PPP) can qualify for partial loan forgiveness if less than 60% of the PPP loan is used for payroll, the U.S. Small Business Administration (SBA) and Treasury said Monday.

Legislation signed June 5 lowered to 60% from 75% the minimum percentage of PPP funds borrowers have to spend on payroll costs to have the loans forgiven. But while the original PPP rules allowed for partial loan forgiveness under the 75% basement, the new bill passed by Congress had language that could be interpreted as saying that if the borrower did not spend at least 60% of the PPP funds on payroll costs, none of the loan would be forgiven.

But a [joint statement](#) Monday from SBA Administrator Jovita Carranza and Treasury Secretary Steven Mnuchin clarified that partial loan forgiveness will also be available under the 60% threshold. Specifically, if a borrower uses less than 60% of the loan amount for payroll costs during the forgiveness covered period, the borrower will continue to be eligible for partial loan forgiveness, subject to at least 60% of the loan forgiveness amount having been used for payroll costs.

A co-sponsor of the bill in the House, Rep. Chip Roy, R-Texas, had said in a speech on the House floor that the intention was to maintain partial forgiveness, but Sens. Marco Rubio, R-Fla., and Susan Collins, R-Maine, had expressed concerns that the language in the new legislation could create what Collins termed a 60% cliff. Monday's statement addresses those concerns.

New rules, guidance, applications coming

The SBA, in consultation with Treasury, will "promptly" issue rules and guidance, a modified borrower application form, and a modified loan forgiveness application implementing the amendments to the PPP made in the new law, the statement said. In addition to confirming that June 30, 2020, remains the last date on which a PPP loan application can be approved, the new rules will implement the following changes:

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- Extend the covered period for loan forgiveness from eight weeks after the date of loan disbursement to 24 weeks after the date of loan disbursement, providing substantially greater flexibility for borrowers to qualify for loan forgiveness. Borrowers that have already received PPP loans retain the option to use an eight-week covered period.
- Provide a safe harbor from reductions in loan forgiveness based on reductions in full-time-equivalent (FTE) employees for borrowers that are unable to return to the same level of business activity the business was operating at before Feb. 15, 2020, due to compliance with requirements or guidance issued between March 1, 2020, and Dec. 31, 2020, by the secretary of Health and Human Services, the director of the Centers for Disease Control and Prevention, or the Occupational Safety and Health Administration related to worker or customer safety requirements related to COVID-19.
- Provide a safe harbor from reductions in loan forgiveness based on reductions in FTE employees, to provide protections for borrowers that are both unable to rehire individuals who were employees of the borrower on Feb. 15, 2020, and unable to hire similarly qualified employees for unfilled positions by Dec. 31, 2020.
- Increase to five years the maturity of PPP loans that are approved by the SBA (based on the date the SBA assigns a loan number) on or after June 5, 2020.
- Extend the deferral period for borrower payments of principal, interest, and fees on PPP loans to the date that the SBA remits the borrower's loan forgiveness amount to the lender (or, if the borrower does not apply for loan forgiveness, 10 months after the end of the borrower's loan forgiveness covered period).

The PPP in brief

The PPP launched in early April with \$349 billion in funding that was exhausted in less than two weeks. Congress provided an additional \$310 billion in funding in an April 21 vote, but demand for the program soon waned due to controversies over publicly traded companies and other large enterprises being awarded loans. Concerns about the attainability of loan forgiveness under the program's rules also contributed to small businesses and other eligible entities casting a wary eye to the program.

Congress established the PPP to provide relief to small businesses during the coronavirus pandemic as part of the \$2 trillion Coronavirus Aid, Relief, and Economic Security (CARES) Act, P.L. 116-136. The legislation authorized Treasury to use the SBA's 7(a) small business lending program to fund loans of up to \$10 million per borrower that qualifying businesses could spend to cover payroll, mortgage interest, rent, and utilities.

PPP funds are available to small businesses that were in operation on Feb. 15 with 500 or fewer employees, including tax-exempt not-for-profits, veterans' organizations, tribal concerns, self-employed individuals, sole proprietorships, and independent contractors. Businesses with more than 500 employees also can apply for loans in certain situations.

The AICPA's [SBA Paycheck Protection Program Resources for CPAs](#) page houses resources and tools produced by the AICPA to help address the economic impact of the coronavirus.

For more news and reporting on the coronavirus and how CPAs can handle challenges related to the outbreak, visit the JofA's [coronavirus resources page](#) or [subscribe to our email alerts](#) for breaking PPP news.

— **Jeff Drew** (Jeff.Drew@aicpa-cima.com) is a JofA senior editor.

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Keeping you informed and prepared amid the coronavirus crisis

We're gathering the latest news stories along with relevant columns, tips, podcasts, and videos on this page, along with curated items from our archives to help with uncertainty and disruption.

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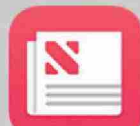
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Last Updated: February 2022

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We may change this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, in some cases, we may provide you with additional notice (such as adding a statement to our website homepage or sending you a notification). We encourage you to review the Privacy Policy whenever you access the Services or otherwise interact with us to stay informed about our information practices and the choices available to you.

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Collection of Information

Information You Provide to Us

We collect information you provide directly to us. For example, we collect information when you create an account, fill out a form, participate in a survey, review, contest or promotion, make a purchase, apply for a job or upload your resume, communicate with us via third party social media sites, request customer support, or otherwise communicate with us. The types of information we may collect include your name, email address, postal address, phone number, credit card and other payment information, age, location, your pet's information (name, breed, date of birth, gender, etc.) and any other information you choose to provide.

Other Information We Collect

When you access or use our Services or transact business with us, we automatically collect information about you, including:

- **Transactional Information:** When you make a purchase or return, we collect information about the transaction, such as product details, purchase price, and date and location of the transaction.
- **Log Information:** We collect information related to your access to and use of the Services, including the type of browser you use, app version, access times, pages viewed, your IP address, site interaction data, and the page you visited before navigating to our Services.
- **Device Information:** We collect information about the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers, and mobile network information.
- **Visual Information:** We utilize cameras in our stores for security purposes and to measure and observe customer traffic patterns to improve our stores and services.
- **Location Information:** We may derive the approximate location of your device from your IP address. In accordance with your device permissions, we may also collect information about the precise location of your device. You have the ability to stop the collection of precise location information at any time (see [Your Choices](#) below for details).
- **Information Collected by Cookies and Similar Tracking Technologies:** We (and our service providers) use different technologies to collect information, including cookies and web beacons and other tracking mechanisms. Cookies are small data files stored on your hard drive or in your device memory that help us improve our Services and your experience, see which areas and features of our Services are popular, and count visits. Web beacons (also known as "pixel tags" or "clear GIFs") are electronic images that may be used in our Services or emails and help deliver cookies, count visits, and help us understand usage and campaign effectiveness. For more information about cookies and how to disable them, see [Your Choices](#)



below.

Information Collected from Other Sources

We may also obtain information about you from other sources. For example, we may collect information about you from third parties, such as mailing list providers, data enhancement sources and publicly available sources, including information you submit in a public forum (e.g., a blog, chat room, or social media). If you apply for a job with us, we will receive your application information from our job applicant processing partners. Additionally, if you create or log into your account through a social media site, we may have access to certain information from that site, such as your name, account information, and friends lists, in accordance with the authorization procedures determined by such social media site.

Use of Information

We use the information we collect to deliver the products and services you request and customize your experience with us. We also use the information we collect to:

- Provide, maintain and improve our products and services;
- Conduct audits related to a current interaction with the consumer and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards;
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and protect the rights and property of PetSmart and others;
- Debug to identify and repair errors that impair existing intended functionality;
- For limited, internal and operational use, such as to enable our website to function;
- Perform services on behalf of us or a service provider, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing advertising or marketing services, or conducting analytic services;
- Undertake internal research for technological development and demonstration;
- Undertake activities to verify or maintain the quality or safety of a service or device that we own, manufacture, or control, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by, us;
- Send you technical notices, updates, security alerts, and support and administrative messages and to respond to your comments, questions, and customer service requests;
- Communicate with you about products, services, and events offered by PetSmart and others, and provide news and information we think will be of interest to you (see [Your Choices](#) below for information about how to opt out of these communications at any time);
- Personalize your online experience and the advertisements you see when you use the Services or third-party platforms based on your preferences, interests, and browsing and purchasing behavior;
- Facilitate contests, sweepstakes, and promotions and process and deliver entries



and rewards;

- Evaluate your application and qualifications for employment with us; and
- Carry out any other purpose described to you at the time the information was collected.

Sharing of Information

We may share information as follows:

- With vendors, service providers, and consultants that perform services for us, including e-mail and mobile marketing, analytics, web hosting, call center services, payment processing, coupon delivery, and data enhancement;
- With entities who may provide financing for your purchase;
- With the public, if you post information online and elect to make it available to the public, such as by writing a product review on our website;
- In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements;
- If we believe your actions are inconsistent with our user agreements or policies, if we believe you have violated the law, or to protect the rights, property, and safety of PetSmart or others;
- In connection with, or during negotiations of, any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;
- Between and among PetSmart and our current and future parents, affiliates, subsidiaries, and other companies under common control and ownership; and
- With your consent or at your direction.

We may also share aggregated or de-identified information that cannot reasonably be used to identify you.

Social Sharing Features and Third-Party Privacy Policies

The Services may offer social sharing features and other integrated tools (such as the Facebook "Like" button), which let you share actions you take on our Services with other media. Your use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature. Your interactions with those features are governed by the privacy policies of the entities that provide these features. For more information about the purpose and scope of data collection and processing in connection with social sharing features, please visit their privacy policies.

Please note that when you apply for a job with us, the privacy policies of our job applicant processing partners may govern the submission of your application information.

Advertising and Analytics Services



Provided by Others

We may allow others to provide analytics services and serve advertisements on our behalf across the web and in mobile applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked, and conversion information. This information may be used by PetSmart and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services and other websites, and better understand your online activity. For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit www.aboutads.info/choices. Your device may also include a feature ("Limit Ad Tracking" on iOS or "Opt Out of Interest-Based Ads" or "Opt Out of Ads Personalization" on Android) that allows you to opt out of having certain information collected through apps used for behavioral advertising purposes.

Data Retention and Security

Data Retention

We store the information we collect about you and your pet(s) for as long as is necessary for the purpose(s) for which we originally collected it, or for other legitimate business purposes, including to meet our legal, regulatory, or other compliance obligations.

Data Security

We maintain administrative, technical and physical safeguards to protect your personal information. However, no e-commerce solution or website is completely secure. You are also responsible for taking reasonable steps to protect your personal information, such as using strong passwords and using different passwords across your online accounts. We will never request your password or credit card information through email.

Children's Personal Information

We recognize the particular importance of protecting privacy where children are involved. We do not knowingly collect personal information online from children under the age of 16.

Transfer of Information to the U.S. and Other Countries

PetSmart is based in the United States and we process and store information in the U.S. and other countries. Therefore, we and our service providers may transfer your information to, or store or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction.



Your Choices

Account Information

You may update and correct certain account information you provide to us at any time by logging into your account or calling our Customer Care number at 1-888-839-9638 (U.S. Customers) or 1-321-309-9065 (Customers outside of the U.S.).

Location Information

When you first launch any of our mobile applications that collect precise location information, you will be asked to consent to the application's collection of this information. If you initially consent to our collection of this location information, you can subsequently stop the collection of this information at any time by changing the preferences on your mobile device. If you do so, our mobile applications, or certain features thereof, may no longer function properly. You may also stop our collection of this location information by following the standard uninstall process to remove all of our mobile applications from your device. Certain mobile devices contain geo-location tracking capability. We may use such capability or other geo-location tracking technology to identify the location of devices in our store or nearby for marketing, to generate coupons or other offers, and for analytical purposes.

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Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. The Help or similar function of your browser should contain instructions to set your computer to accept all cookies, to notify you when a cookie is issued, or to not receive cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services.

Promotional Communications

You may opt out of receiving promotional emails from PetSmart by following the instructions in those emails or by logging into your account and changing your preferences. If you opt out, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

SMS Privacy Policy

By participating in any of our mobile programs, you agree to receive automated marketing phone calls and text messages at the phone number you provided at opt-in. Your consent to receive marketing messages is not required to make a purchase. You agree to notify PetSmart at the Contact Us information below in the event that you change or disconnect your mobile phone number. Phone calls made and text messages sent to your mobile device may be generated using automated telephone dialing technology. Message and data rates may apply and are billed by and payable to your mobile service provider. Delivery of messages are subject to the effective transmission by your mobile service provider and any policies or terms established by your mobile service provider. To cancel general promotional messages from PetSmart, text



"STOP" to 704704 and to cancel transactional messages from PetSmart, text "STOP" to 26392.

With your consent, we may send promotional and non-promotional push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

Your California Privacy Rights

Consumers residing in California have certain additional rights with respect to their personal information under the California Consumer Privacy Act or ("CCPA") (California Civil Code Section 1798.100 et seq.) and the "Shine the Light" Law (California Civil Code Section 1798.83).

California Consumer Privacy Act

Additional Disclosures Related to the Collection, Use, Disclosure and Sale of Personal Information

Categories of Personal Information Collected: In the preceding 12 months, we have collected the following categories of personal information: identifiers, commercial information, characteristics of protected classifications under California or U.S. law, geolocation data, Internet or other electronic activity information, and inferences drawn about any of the preceding categories of information. We also collect the following categories of personal information from job applicants: professional or employment related information and education information. For examples of the data points we collect, please see "Collection of Information" [above](#).

Business or Commercial Purpose for Collecting and Selling Information: We collect personal information for the business and commercial purposes described in "Use of Information" [above](#).

Categories of Sources of Personal Information: We collect personal information directly from you when you interact with our Services, shop in our stores, contact us through customer service or other mechanisms, or use our pet-focused services, automatically when you access or use our Services, purchase products or services from us and from third-party sources as described in "Information Collected from Other Sources" [above](#).

Categories of Third Parties with Whom We Share Information: We may share your personal information with third parties as described in the "Sharing of Information" [section above](#).

Categories of Personal Information Disclosed: In the preceding 12 months, depending on your interactions with us, we may have disclosed the following categories of personal information for business or commercial purposes: identifiers, financial information, characteristics of protected classifications under California or U.S. law, geolocation data, Internet or other electronic activity information, and inferences drawn about any of the preceding categories of information.

Sale of Personal Information: California law requires that we provide transparency about personal information we "sell," which for the purposes of the CCPA, means scenarios in which PetSmart has shared personal information with partners in exchange for valuable consideration. In the preceding 12 months, depending on your interactions with us, we may have "sold" the following categories of personal information: identifiers and internet or other electronic network activity information. PetSmart is a pet specialty retailer in the business of offering pet related goods and services to pet parents. As such, PetSmart's business model does not include sharing your identifying information such as your name, email address, phone number, or postal address to third parties in exchange for money. However, we do share identifiers such as name, email or

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postal address with our subsidiaries to offer you our pet-related goods and other identifiers such as cookies and the advertising identifier associated with your mobile device with our advertising partners to show our ads that are targeted to your interests.

Your Consumer Rights

What are the CCPA Consumer Rights?:

- **Access.** California consumers have the right to request access to the specific pieces of personal information we have collected about them in the last 12 months. They may also request the categories of personal information we have collected about them, the categories of sources of such collection, the business or commercial purpose for collecting or selling personal information, the categories of third parties with whom we share and sell their personal information, and the categories of personal information we have disclosed and sold about them in the preceding 12 months.
- **Deletion.** California consumers have the right to request deletion of their personal information (subject to certain exceptions).
- **Opt Out of Sale.** California consumers have the right to opt out of the sale of their personal information. California consumers above the age of 16 have the right to opt out of these sales at any time. We do not knowingly collect online or sell personal information about consumers under the age of 16.
- **Nondiscrimination.** California consumers have the right to receive equal service and price and not be discriminated against for exercising any of their CCPA rights, however, financial incentive programs may condition participation on collection of personal information.

How to request CCPA Consumer Rights: California consumers may make a rights request by calling 1-888-839-9638 or visiting the following pages:

- [Access](#)
- [Deletion](#)
- [Do Not Sell My Personal Information](#)

To confirm your identity and ensure we respect your privacy and security, we will prompt you to verify your request by logging into your account (if applicable), replying to an email, or calling us. Please follow the instructions provided when you submit your rights request. **Caution**, if you choose to have your personal information deleted, we can no longer provide you with certain Services, such as Treats membership (and you will be deleting any Treats points balance you have accrued), auto ship enrollment, or remember your preferences for certain pet services such as Grooming, because we will no longer know who you are. Notwithstanding a deletion request, we may retain personal information that is necessary for us to fulfill our legal obligations or that is not otherwise subject to deletion under applicable law.

Financial Incentives Program: You have the right to receive equal service and price and not be discriminated against for exercising any of your CCPA rights. However, the CCPA allows us to offer certain financial incentive programs that may result in different prices, rates or quality levels. We currently provide such a program, the Treats customer loyalty program. Treats is free to join and offers you points on purchases and access to member-only deals and discounts. You may withdraw from membership at any time. You can learn more about Treats [here](#).

2020 CCPA Requests - Reporting Metrics:



Request Type	Received	Completed	Denied	Avg Response Time (Days)
Access	32	24	8	14.5
Delete	154	132	22	7.4
Opt Out	1750	1386	364	0.25

Notice of Financial Incentives:

We offer various financial incentives. For example, we may provide discounts, rewards, exclusive offers, or other benefits to customers who sign up to join our [Treats loyalty program](#) or to participate in a promotional campaign. When you participate in a financial incentive, we collect personal information from you, such as identifiers (like your name, email address, or phone number) and commercial information (like your purchase preferences and interests or purchase history). You can opt into a financial incentive by following the sign-up or participation instructions provided, and, for any ongoing benefits, you have the ability to opt-out at any time, such as by following the instructions set forth in the applicable promotional campaign or program, or contacting us through one of the methods listed [here](#). In some cases, we may provide additional terms and conditions for a financial incentive, which we will provide to you when you sign up. The value of your personal information is reasonably related to the value of the offer or discount presented to you.

Shine the Light

California law permits residents of California to request certain details about how their information is shared with third parties for direct marketing purposes. If you are a California resident and would like to make such a request, please use the Contact Us information below.

Nevada Residents

We do not sell your name, email address, phone number, address, or other information that identifies you to nonaffiliated third parties. Nevada residents have the right to request that we not sell this information in the future. To make such a request, please use the Contact Us information below.



Contact Us

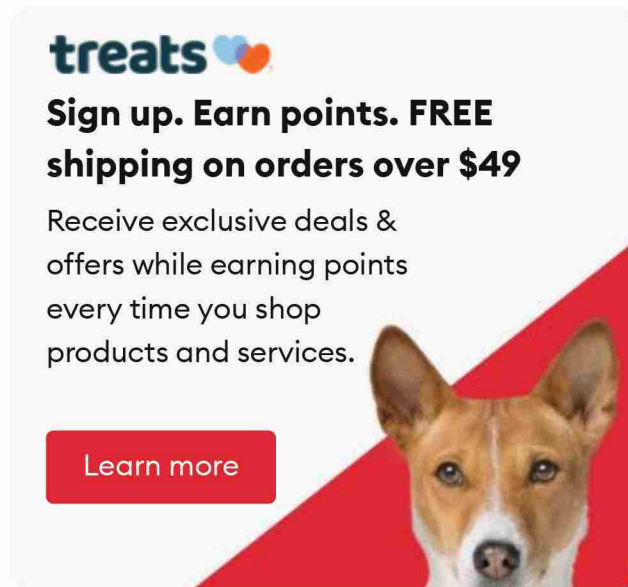
If you have any questions about this Privacy Policy, please contact us at:

Email: CustomerCare@petsmart.com

Mail PetSmart LLC
Attn: Privacy Officer
19601 N. 27th Avenue

Phoenix, AZ 85027

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Save 20% on your order with purchase of \$50 or more in Pharmacy. Offer valid online only at [petsmart.com](https://www.petsmart.com) or on the app. Offer not valid on services, gift cards, gift certificates, previous purchases, charitable donations, and may exclude all or select items from various brands. Offer may not be combined with other promotional offers or discounts and specifically excludes any available Autoship offers. Limited to one time per customer during the offer period. Transaction total is prior to taxes & after discounts are applied. Savings will automatically reflect in the shopping cart with the purchase of qualifying merchandise. Terms and conditions of this offer are subject to change at the sole discretion of PetSmart. Offer valid through May 2nd, 2022 @ 7:30 am EST.

Treats members enjoy Free Standard Shipping on orders over \$49. Must be signed into your Treats account prior to purchase. Transaction total is prior to taxes & after discounts are applied. Savings will automatically reflect in shopping cart with the purchase of qualifying merchandise. Maximum value \$75. Due to size and/or weight, certain items bear an additional shipping surcharge or special handling fee. Valid only on orders shipped within the contiguous 48 U.S. states, military APO/FPO addresses and select areas throughout Canada. Offer not valid on all or select products in the following categories: live pets, canned, fresh or frozen foods, select cat litters. Offer may not be combinable with other promotional offers or discounts. Terms and conditions of this offer are subject to change at the sole discretion of PetSmart. Delivery may be delayed due to acts beyond our reasonable control, which may include, but are not limited to, weather, strikes, power outages, shutdowns, local, provincial or federal governmental actions, and other similar acts. Offer valid on [PetSmart.com](https://www.petsmart.com).

Free Same-Day Delivery offer valid on select merchandise purchased at [petsmart.com](https://www.petsmart.com) when choosing Same-Day Delivery. Same-day delivery is available in most areas. Order by 9am for delivery between 12pm-3pm, by 1pm for delivery between 3pm-6pm, & by 3pm for delivery between 6pm-8pm. Orders placed after 3pm will be fulfilled the next day. Delivery may be delayed due to acts beyond our reasonable control, which may include, but are not limited to, weather, strikes, power outages, shutdowns, local, provincial or federal governmental actions, and other similar acts. While delivery is contact-free, be sure to be home during your delivery window to bring any perishable items inside right away. Prices & selection may vary in stores & online. While supplies last. Quantities may be limited. See www.petsmart.com/help or store associate for more details.

FEEDBACK



EXHIBIT 82

MORGAN & MORGAN, P.A. PRIVACY POLICY

Morgan & Morgan, P.A. and its affiliates (referred to herein as "MM", "we", "us", or "our") respects your privacy and is committed to complying with this privacy policy ("Privacy Policy"), which describes what information we collect about you, how we use it, with whom we may share it, and what choices you have regarding our use of your information. This Privacy Policy applies to personal information collected in connection with our website located at <https://forthepeople.com> and any other webpage that MM maintains that links to this Privacy Policy (collectively, the "Site"), any current or future mobile applications associated with MM or the website (collectively, the "App"), our email communications, our social media pages, other online or wireless offerings that post a link to the Privacy Policy, and other circumstances in connection with the services we provide (collectively, the "Platform").

TYPES OF PERSONAL INFORMATION WE COLLECT

The types of personal information we collect will depend on the services you request and, if you are a client, the nature of our representation or your case. The table below describes some of the categories (with non-exhaustive examples) of personal information we may collect about you:

Categories	Examples
A. Individual	Contact information , such as name, email address, phone number, mailing address, job title, and organization. Identifiers , such as client ID, username, IP

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877 830 2711**B. Sensitive****Financial information**, such as financial account numbers, wiring instructions, insurance

Personal Information	<p>Privacy Policy - Morgan & Morgan policy numbers, invoices, and other payment or bank account details.</p> <p>Medical information, such as doctor's notes, treatment plans, medical conditions, prescription medicines, insurance documentation, doctor visit information, daily symptom reporting, and other records and information.</p>
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C. Geolocation Data	<p>Precise physical location, which we may collect via the App if you consent to that collection through the App.</p>
E. Sensory Data	<p>Call recordings, such as our recordings of calls you make to our customer service team.</p> <p>Other sensory data, such as any audio recordings, photographs, videos, or similar data that may be provided as part of a case file.</p>
F. Biometric Information	<p>Biometric information, such as facial scans or fingerprint scans if you opt-in to using this information for logging in or authenticating your account on the App.</p>
G. Commercial Information	<p>Representation information, such as details about your claim, case, or other legal matter, the distribution of settlement of other payments to you (if applicable).</p> <p>Account information, such as the username and password you provide when you register for an account and any information stored or transmitted in your account or profile.</p> <p>Communications, such as when you call or email us, confidential and privileged communications that you may make with our attorneys, and your conversations with our digital chat services.</p>
H. Internet or Network Activity	<p>Online activity information, such as linking pages, pages or screens viewed, time spent on a page or screen, navigation paths between pages or screens, information about activity on a page or screen, access times, duration of access, and other online activity information.</p> <p>Device information, such as computer and mobile operating system, operating system type and version number, wireless carrier, manufacturer and model, browser type, screen resolution, general location information such as city, state, or geographic area, and other device information collected automatically.</p>
I. Professional or Employment-Related Information	<p>Job application information, such as your resume or CV, background check information, references, and other information.</p> <p>Employment information, such as title, role, employer, employment history, current or past job history, and other professional information.</p>

J. Education Information	Education records , such as transcripts or education history.
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K. Inferences Drawn from Personal Information	Profiles reflecting preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.
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We may collect the categories of personal information described above from the following sources:

- **Personal Information You Provide Us.** We collect the personal information that you provide to us while using our Platform, including contacting us, creating an account, applying for a position, or otherwise. Further, where expressly designated by MM, some portions of the Services may be used by active MM clients to communicate pursuant to an attorney/client relationship. You may choose whether or not to provide such information; however, the information may be required to respond to your request.
- **Personal Information Collected Automatically.** We and our third party providers may use cookies and other technologies such as log files, cookies, tracking pixels, and analytic tools and services to collect personal information automatically about you. Such information includes your geolocation and the online identifiers, device information, and online activity information described above. To facilitate the automatic collection described above, we may use the following technologies:
 - **Cookies.** A cookie is a small piece of data stored by your web browser on your computer or mobile device. We use cookies to collect information from you regarding your usage of the Platform in order to remember user preferences and settings, personalize your experience with the Platform, facilitate online advertising, and for security purposes. You may opt-out of the automatic collection of some information by referring to your web browser or mobile device options or settings menu. However, doing so may disable many of the portions, features, or functionality of the Platform. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences or visit <http://www.allaboutcookies.org> for more information.
 - **Pixels.** Pixels, which are also known as "web beacons," or "clear GIFs," are typically used to determine whether a webpage or email was accessed or opened, or that certain content was viewed or clicked. Data collected from pixels is often used to compile statistics about usage of websites and the success of email marketing campaigns.
 - **SDKs.** Software development kits, or "SDKs," are third-party computer codes used in connection with the App for a variety of purposes, including to provide analytics regarding the use of the App, integrate with social media, add features or functionality to the App, or facilitate online advertising. SDKs may enable third parties to collect information directly via the App.
- **Personal Information Collected from Third Parties.** We may also

collect or receive personal information from third parties, which may include:

- **Our business partners**, such as third-party data providers and advertising partners.
- **Public sources**, such as social media platforms and publicly-available records.
- **Individuals or entities involved in our clients' legal matters**, such as doctors, other parties, and other individuals that you may direct to provide us with information.
- **Referral sources**, such as members of our referral network, website submissions, and other referral sources.

ONLINE ANALYTICS

We may use third party analytics tools, such as Google Analytics and Mouseflow, in order to better understand your use of our Platform and how we can improve them. These tools collect information sent by your browser or mobile device, including the pages you visit and other usage information. For more information regarding how Google collects, uses, and shares your information please visit <http://www.google.com/policies/privacy/partners/>. For more information on Mouseflow's privacy practices, please visit <https://mouseflow.com/privacy/>. To prevent data from being used by Google Analytics, you can download the opt-out browser add-on at: <http://tools.google.com/dlpage/gaoptout?hl=en>. You can opt out of Mouseflow analytics at: <https://mouseflow.com/opt-out/>.

USE OF PERSONAL INFORMATION

We may use the personal information we collect for the following purposes and as otherwise described in this Privacy Policy or at the time of collection:

- **To Provide Our Platform.** We use personal information to provide our services, including the Platform. For example, we use personal information:
 - to facilitate your requests for a free case evaluation and determine your legal needs;
 - to provide you with legal and other services, content, and features you request;
 - to create, manage, and monitor your account;
 - to respond to your inquiries and communicate with you, including placing calls or sending texts using any automated technology, including prerecorded messages;
 - to operate, troubleshoot, and improve the Platform;
 - to process your transactions, invoices, and settlement payments;
 - to understand your interests, personalize your experience on the Platform, and deliver information about products and services relevant to your interests;
 - respond to your inquiries and requests for customer support, including to investigate and address your concerns and monitor and improve our responses; and
 - enable security features of the Platform, such as by sending you security codes via email or SMS, and remembering devices from which you have previously logged in.
- **For Direct Marketing.** We may use your personal information to send you newsletters, legal updates, event information, marketing communications, and other information that may interest you.
- **For Research and Development.** We use personal information for research and development purposes and to understand how people are using the Platform, including by generating and analyzing

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 We use the information we collect, including your personal information, to analyze statistics, preferences, and usage trends, to make our Platform and other offerings better, diagnose technical issues, and develop new features and functionality. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Platform and promote our business.

- **For Hiring Purposes.** If you apply to one of our open positions, submit application information or inquire about a position, we will use your personal information as part of the evaluation, recruitment, and hiring of personnel, including conducting background checks and contacting references.
- **For Compliance, Fraud Prevention and Safety.**
 - to enforce our Terms of Use and other agreements we may have;
 - to comply with applicable laws, regulations, and legal processes;
 - to protect our, your, or others' rights, privacy, safety, or property (including by making and defending legal claims);
 - to maintain the security and integrity of our business, the Platform, users, our third party business partners and service providers our databases and other technology assets;
 - audit our internal processes for compliance with legal and contractual requirements and internal policies; and
 - prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.
- **For Interest-Based Advertising.** We, our business partners, and our third party advertising partners may collect and use your personal information for advertising purposes. We may contract with third-party advertising companies and social media companies to help us advertise our services, identify potential customers, and display ads on our Platform and other sites and services, including through the use of interest-based advertising. These companies may use cookies and similar technologies to collect information about you (including the device information and online activity information described above) over time across our Platform and other sites and services or your interaction with our emails, and use that information to serve ads that they think will interest you and/or use hashed customer lists that we share with them to deliver ads to you and to similar users on their sites and services. You can learn more about your choices for limiting interest-based advertising, in the "Advertising Choices" section below.

SHARING OF PERSONAL INFORMATION

In addition to the specific situations discussed elsewhere in this Privacy Policy or as otherwise described at the time of collection, we may share personal information with the following categories of recipients:

- **Service Providers.** MM may share your personal information with third-party service providers that perform services for us or on our behalf, such as web-hosting companies, mailing vendors, analytics providers, event hosting services, and information technology providers.
- **Other Law Firms or Lawyers.** MM may share, at your direction or with your permission, your personal information with other law firms and/or other lawyers where we jointly represent a client and when we refer cases or potential cases to other counsel, or as otherwise required in connection with our legal representation of you.

Personal information provided pursuant to an attorney/client

relationship may not be shared with third parties except as is done with such precautions to preserve the confidentiality of such information and any attorney/client privilege as may attach to such information.

- **Authorities, Law Enforcement, and Others.** MM may disclose personal information to comply with laws, regulations or other legal obligations, to assist in an investigation, to protect and defend our rights and property, or the rights or safety of third parties, to enforce our agreements, Terms of Use or this Privacy Policy or agreements with third parties, or for crime-prevention purposes.
- **Business Transactions.** MM may disclose your personal information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a transaction (or potential transaction) such as a corporate divestiture, financing, merger, consolidation, acquisition, reorganization, sale, spin-off, or other disposition of all or any portion of the business or assets of, or equity interests in, MM or our related companies (including in connection with a bankruptcy or similar proceedings).
- **Advertising Partners.** We may share your personal information with third party advertising or joint marketing partners for the purposes described in this Privacy Policy or at the time of collection.
- **Professional Advisors.** We may disclose your personal information to our professional advisors, such as lawyers, bankers, auditors and insurers, where necessary in the course of the professional services that they render to us.
- **Affiliates and Related Companies.** We may share your personal information with companies that are affiliated with us (that is, that control, are controlled by, or are under common control with us) or may be affiliated with us in the future for the purposes described in this Privacy Policy.
- **Consent.** MM may otherwise disclose your Personal Information in accordance with your consent.

YOUR CHOICES

- **Opt-Out of Marketing Communications.** If you no longer wish to receive marketing communications from us, you can let us know by sending an email to contact@forthepeople.com or by mail at the address provided below in "Contact Us". The electronic marketing communications we send may also contain an opt-out mechanism. Please note that it may take up to 10 calendar days to remove your contact information from our marketing communications lists, so you may receive correspondence from us for a short time after you make your request. Please also contact us to update or correct your information if it changes or if you believe that any information that we have collected about you is inaccurate.
- **Text Messages.** We may offer communications via SMS texts or similar technology sent by MM or our service providers, such as when we send you text messages for customer service, account-related, or marketing purposes. To stop receiving text messages from a short code operated by MM, reply STOP. Note that we may send you a message to confirm receipt of your STOP request. Message and data rates may apply for this service. You can also opt-out of MM marketing texts by emailing us your request and mobile telephone number to contact@forthepeople.com.
- **Cookies.** Most browsers let you remove or stop accepting cookies from the websites you visit. To do this, follow the instructions in your browser's settings. Many browsers accept cookies by default until you change your settings. If you do not accept cookies, however, you may not be able to use all functionality of the Platform and our

Site may not work properly. For more information about cookies, including how to see what cookies have been set on your browser and how to manage and delete them, visit www.allaboutcookies.org.

- **Advertising Choices.** Some of our advertising partners are members of the Network Advertising Initiative (NAI) and are subject to the Self-Regulatory Principles for Online Behavioral Advertising published by the Digital Advertising Alliance (DAA). You can obtain more information about these companies' information collection practices and opt-out of receiving interest-based advertising from participating NAI and DAA members at http://www.networkadvertising.org/managing/opt_out.asp and/or the DAA's website at optout.aboutads.info. You can also limit collection of your information for interest-based ads by blocking third party cookies in your browser settings or using privacy plug-ins or ad blocking software that help you block third party cookies. In addition, your mobile device settings may provide functionality to limit use of the advertising ID associated with your mobile device for targeted online advertising purposes. If you opt-out of interest-based advertisements, you will still see advertisements online but they may be less relevant to you. Some of the third party advertising companies we may work with offer their own opt-out options that you can use to limit their use of your information for interest-based advertising. Please note that we also may work with companies that offer their own opt-out mechanisms, such as Google (<https://adssettings.google.com/authenticated>) and Facebook (<https://www.facebook.com/about/ads>), or do not participate in the opt-out mechanisms described above. Even after using these opt-out mechanisms, you may receive interest-based advertising from other companies.
- **Declining to Provide Information.** We need to collect personal information to provide certain services. If you do not provide the information requested, we may not be able to provide those services.

INFORMATION SECURITY

MM takes commercially reasonable measures to secure and protect the personal information we collect. Nevertheless, no security system is impenetrable. We cannot guarantee the absolute security of your personal information. Moreover, we are not responsible for the security of information you transmit to us over networks that we do not control, including the Internet and wireless networks.

LINKED WEBSITES

This Privacy Policy does not apply to third-party websites or social media features that may be accessed through links that we provide for your convenience and information. Accessing those links will cause you to leave MM's website and may result in the collection of information about you by a third party. We do not control, endorse or make any representations about those third party websites or their privacy practices, which may differ from ours. We encourage you to review the privacy policy of any site you interact with before allowing the collection and use of your information.

DO NOT TRACK REQUESTS

We adhere to the standards set out in this Privacy Policy and do not monitor or follow any Do Not Track browser requests. To find out more about "Do Not Track," please visit <http://www.allaboutdnt.com>.

MM is headquartered in the United States of America, and we may have affiliates and service providers in the United States and other countries. Please be aware that your personal information may be transferred to, stored or processed in the United States, where our servers are located and our central database is operated, and other locations outside of your home country. The data protection and other laws of these countries might not be as comprehensive as those in your country. By using any portion of the Platform, you understand and consent to the transfer of your personal information to our facilities in the United States and those third parties with whom we share it as described in this Privacy Policy.

CHILDREN'S PRIVACY

We do not knowingly solicit or collect personal information online from children under the age of 16. Please contact us as provided below in the Contact Us section if you believe we may have collected such information.

YOUR CALIFORNIA PRIVACY RIGHTS

This section applies only to California residents. It describes how we collect, use, and share personal information of California residents when we act as a "business" as defined under California privacy law, and their rights with respect to their personal information. For purposes of this section, "personal information" has the meaning given under California privacy law but does not include information exempted from the scope of those laws. In some situations we may provide a different privacy notice to certain categories of California residents, whereby that notice will apply instead of this section.

California Civil Code Section § 1798.83 permits users of our Platform who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to contact@forthepeople.com.

In addition, the state of California provides California residents with certain other rights concerning their personal information. This section describes (1) the categories of personal information, collected and disclosed by MM, subject to California privacy law, (2) your privacy rights under California privacy law, and (3) how to exercise your rights.

Personal Information That We Collect, Use, and Disclose

In accordance with California law, we describe:

- the categories of personal information we may have collected about you in the preceding 12 months and the categories of sources from which we collected your personal information in the section above called "Types of Personal Information We Collect";
- the business and commercial purposes for which we collect this information in the section above called "Use of Personal Information"; and
- the categories of third parties to whom we disclose this information in the section above called "Sharing of Personal Information".

MM must also disclose whether the following categories of personal information are disclosed for a "business purpose" or "valuable consideration" as those terms are defined under California privacy law, which also calls this latter category a "sale." Note that while a category below may be marked, that does not necessarily mean that we have personal information in that category about you.

In the preceding twelve months, we have disclosed the following categories of personal information in the manner described:

Category	Personal Information is Disclosed for a Business Purpose	PurposePersonal Information is Disclosed for Valuable Consideration
A. Individual Identifiers and Demographic Information	Yes	Yes
B. Sensitive Personal Information	Yes	No
C. Geolocation Data	Yes	No
E. Sensory Data	Yes	No
F. Biometric Information	Yes	No
G. Commercial Information	Yes;	No
H. Internet or Network Activity	Yes	Yes
I. Professional or Employment-Related Information	Yes	No
J. Education Information	Yes	No
K. Inferences Drawn from Personal Information	Yes	No

Your Privacy Rights Under California Law

Under California law, subject to certain exceptions, California residents have the following rights with respect to their personal information:

- **Access.** You have the right to request information on the categories of personal information that we collected about you in the previous 12 months, the categories of sources from which the personal

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 information was collected, the specific pieces of personal information we have collected about you, the business and commercial purposes for which such personal information is collected and shared, and the categories of third parties to whom we disclose such personal information.

- **Erasure.** You have the right to request we delete your personal information, subject to certain exceptions.
- **Opt-Out of Sales.** If we “sell” your personal information, you can opt-out.
- **Non-discrimination.** California residents are entitled to exercise the rights described above free from discrimination or legally prohibited increases in the price or decreases in the quality of our products and services.

Please note, these rights are not absolute and in some situations we may not be able to respond to your request, such as when a legal exemption applies or if we are not able to verify your identity.

How to Request to Exercise Your California Privacy Rights

If you would like to exercise your rights listed above, please follow the directions below:

- **Access and Erasure Rights.** Send (or have your authorized agent send) an email to contact@forthepeople.com or call us toll-free at: [1-\(844\) 256-4550](tel:1-844-256-4550).
- **Right to Opt-Out of the Sale of Personal Information.** Under California law, some of the personal information that we share with our advertising partners may qualify as a “sale” as defined under California privacy law. To exercise your right to opt-out of such “sale”, please:
 - Email us at contact@forthepeople.com, or
 - Click here: [Do Not Sell My Personal Information](#)

While we take measures to ensure that those responsible for receiving and responding to your request are informed of your rights and how to help you exercise those rights, when contacting us to exercise your rights, we ask you to please adhere to the following guidelines:

- **Tell Us Which Right You Are Exercising:** Specify which right you want to exercise and the personal information to which your request relates (if not to you). If you are an authorized agent acting on behalf of another consumer, please clearly indicate this fact and your authority to act on such consumer’s behalf. We may require the requester’s proof of identification, the authorized agent’s proof of identification, and any other information that we may request in order to verify your request, including evidence of valid permission to act on requester’s behalf.
- **Help Us Verify Your Identity:** Provide us with information to verify your identity. Please note that if we cannot initially verify your identity, we may request additional information to complete the verification process. Any personal information you disclose to us for purposes of verifying your identity will solely be used for the purpose of verification.
- **Direct Our Response Delivery:** Please provide us with an e-mail or mailing address through which we can provide our response. If you make the request by email, unless otherwise requested, we will assume that we can respond to the email address from which you made the request.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee or decline to comply with your request if your request is clearly unfounded, repetitive, or excessive.

We try to respond to all legitimate requests within 45 days of your request. Occasionally it may take us longer than 45 days to respond, for instance if your request is particularly complex or you have made a number of requests. In this situation, we will notify you of the delay, and may continue to update you regarding the progress of our response.

CHANGES TO THIS PRIVACY POLICY

MM may change this Privacy Policy from time to time to reflect changes in our practices or in applicable law. Such changes will be effective upon posting the revised Privacy Policy on our Platform. You will be able to tell when this Privacy Policy was last updated by the Last Updated date included at the bottom of this Privacy Policy. By continuing to use our Platform, or communicating electronically with us thereafter, you agree to accept such changes to this Privacy Policy.

CONTACT US

If you have any questions about this Privacy Policy or MM's information privacy practices, please contact us at:

E-mail: contact@forthepeople.com

Telephone: [\(407\) 420-1414](tel:(407)420-1414)

Mail: Morgan & Morgan, PA, Attn: Privacy Policy, 20 North Orange Ave, Suite 1600, Orlando, FL 32801

LAST UPDATED: December 23, 2021

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Do Not Sell My Personal Information

EXHIBIT 83

MORGAN & MORGAN, P.A. PRIVACY POLICY

CONSUMER COMMUNICATION

To ensure that consumers' inquiries are handled accurately, courteously, and promptly, phone calls between you and Morgan & Morgan or any of our affiliates, agents, case managers, paralegals, and/or attorneys may be recorded. We may from time to time make calls and/or send text messages to you at any telephone number associated with your account. The manner in which these calls or text (SMS) messages are made to you may include, but is not limited to, the use of prerecorded/artificial voice messages and/or an automatic telephone dialing system. You certify, warrant, and represent that the telephone numbers you have provided to us are your contact numbers. You represent that you are permitted to receive calls at each of the telephone numbers you have provided to us. You agree that Morgan & Morgan may send emails to you at any email address you provide us, or use other electronic means of communication to the extent permitted by law.

GENERAL

Morgan & Morgan, P.A. and its affiliates (referred to herein as "MM", "we", "us", or "our") respects your privacy and is committed to complying with this privacy policy ("Privacy Policy"), which describes what information we collect about you, how we use it, with whom we may share it, and what choices you have regarding our use of your information. This Privacy Policy applies to information collected on our website located at <https://forthepeople.com>, any webpage that MM maintains that links to this Privacy Policy, any current or future mobile applications associated with MM or the website, and other online or wireless offerings that post a link to the Privacy Policy or otherwise provided to, or collected by, us in connection with the services we provide (collectively, the "Services").

Morgan & Morgan Onboarding is a standard-rate, recurring SMS and MMS program which assists new clients of the firm in the onboarding process. Message and data rates may apply. By opting into Morgan & Morgan Onboarding, end-users agree to receive pre-written SMS messages from or on behalf of Morgan & Morgan via short code 529529 and understand that consent is not a condition of service.

TYPES OF INFORMATION WE COLLECT

Definition of Personal Information. "Personal Information" is

information that, either alone or in combination with other information, identifies you. Examples of Personal Information include, among others, name, email address, phone number, and mailing address. Personal Information also includes certain information we collect when you retain MM to represent you in legal matters, including the distribution of settlement or other payments to you, if applicable. This information can include your Social Security number and financial account numbers.

Information You Provide Us. While using our Services, including contacting us, creating an account, or applying for a position, we may ask you to provide us with information (including Personal Information) such as your name, e-mail, phone number, and zip code. Certain features of the website and/or mobile application may allow you to upload information about prescription medicines that interest you. Further, where expressly designated by MM, some portions of the Services may be used by active MM clients to communicate pursuant to an attorney/client relationship. You may choose whether or not to provide such information; however, the information may be required to respond to your request.

Information Collected Automatically. We and our third party providers may use cookies and other technologies such as log files, tracking pixels, and analytic tools and services to collect information (including Personal Information) automatically from you. Such information includes your IP address, location information, the type of the web browser and operating

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options or settings menu. However, doing so may disable many of the portions, features, or functionality of the Services. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences or visit <http://www.allaboutcookies.org> for more information.

ONLINE ANALYTICS

We may use third party analytics tools, such as Google Analytics and Mouseflow, in order to better understand your use of our Services and how we can improve them. These tools collect information sent by your browser or mobile device, including the pages you visit and other usage information. For more information regarding how Google collects, uses, and shares your information please visit <http://www.google.com/policies/privacy/partners/>. For more information on Mouseflow's privacy practices, please visit <https://mouseflow.com/privacy/>. To prevent data from being used by Google Analytics, you can download the opt-out browser add-on at: <http://tools.google.com/dlpage/gaoptout?hl=en>. You can opt out of Mouseflow analytics at: <https://mouseflow.com/opt-out/>.

HOW WE MAY USE YOUR PERSONAL INFORMATION

We may use the Personal Information we collect:

- to facilitate your requests for a free case evaluation and determine your legal needs;
- to provide you with legal and other services you request;
- to create and manage your account;
- to respond to your inquiries and communicate with you, including placing calls or sending texts using any automated technology, including prerecorded messages;
- to send you newsletters, legal updates, event information, marketing communications, and other information that may interest you;
- to operate, troubleshoot, and improve the Service;
- to understand how people are using the Services, including by generating and analyzing statistics;
- to improve and customize communications and advertisements;
- to evaluate, recruit, and hire personnel;
- to enforce our Terms of Use;
- to comply with applicable laws, regulations, and legal processes; and/or
- to protect our rights or property, and the security and integrity of our business, the Services, users, and our third party business partners and service providers.

HOW WE MAY SHARE YOUR PERSONAL INFORMATION

- MM may share your Personal Information with third-party service providers that perform services on our behalf, such as web-hosting companies, mailing vendors, analytics providers, event hosting services, and information technology providers.
- MM may disclose aggregate, de-identified information (i.e. stripped of information that identifies you) to third parties in connection with internal analysis or marketing.
- MM may share, at your direction or with your permission, your Personal Information with other law firms and/or other lawyers where we jointly represent a client and when we refer cases or potential cases to other counsel, or as otherwise required in connection with our legal representation of you. Personal Information provided pursuant to an attorney/client relationship may not be shared with third parties except as is done with such precautions to preserve the confidentiality of such information and any attorney/client privilege as may attach to such information.
- MM may disclose Personal Information to comply with laws, regulations or other legal obligations, to assist in an investigation, to protect and defend our rights and property, or the rights or safety of third parties, to enforce our Terms of Use or this Privacy Policy or agreements with third parties, or for crime-prevention purposes.
- MM may disclose your Personal Information to service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a transaction in which MM is acquired by or merged with another business, or we sell, liquidate, or transfer all or a portion of our assets.
- MM may otherwise disclose your Personal Information in accordance with your consent.

WHAT CHOICES DO YOU HAVE?

If you no longer wish to receive marketing communications from us, you can let us know by sending an email to contact@forthepeople.com or by mail at the address provided below in "Contact Us". The electronic marketing communications we send may also contain an opt-out mechanism. Please note that it may take up to 10 calendar days to remove your contact information from our marketing communications lists, so you may receive correspondence from us for a short time after

Privacy Policy - Morgan & Morgan
you make your request. Please also contact us to update or correct your information if it changes or if you believe that any information that we have collected about you is inaccurate.

INFORMATION SECURITY

MM takes commercially reasonable measures to secure and protect the Personal Information we collect. Nevertheless, no security system is impenetrable. We cannot guarantee the absolute security of your Personal Information. Moreover, we are not responsible for the security of information you transmit to us over networks that we do not control, including the Internet and wireless networks.

LINKED WEBSITES

This Privacy Policy does not apply to third-party websites or social media features that may be accessed through links that we provide for your convenience and information. Accessing those links will cause you to leave MM's website and may result in the collection of information about you by a third party. We do not control, endorse or make any representations about those third party websites or their privacy practices, which may differ from ours. We encourage you to review the privacy policy of any site you interact with before allowing the collection and use of your information.

DO NOT TRACK REQUESTS

We adhere to the standards set out in this Privacy Policy and do not monitor or follow any Do Not Track browser requests.

USING THE SERVICES FROM OUTSIDE THE UNITED STATES

If you are using the Services from outside of the United States of America, please be aware that your Personal Information may be transferred to, stored or processed in the United States, where our servers are located and our central database is operated. The data protection and other laws of the United States might not be as comprehensive as those in your country. By using any portion of the Services, you understand and consent to the transfer of your Personal Information to our facilities in the United States and those third parties with whom we share it as described in this Privacy Policy.

CHILDREN'S PRIVACY

We do not knowingly solicit or collect Personal Information online from children under the age of 13. Please contact us as provided below in the Contact Us section if you believe we may have collected such information without parental or guardian consent.

YOUR CALIFORNIA PRIVACY RIGHTS

California Civil Code Section § 1798.83 permits users of our Services who are California residents to request certain information regarding our disclosure of "Personal Information" (as defined by California law) to third parties for their direct marketing purposes. To make such a request, please send an email to contact@forthepeople.com.

In addition, the state of California provides California residents with certain other rights concerning their Personal Information. This section describes (1) the categories of Personal Information, collected and

1. Collection and Disclosure of Categories of Personal Information under California Privacy Law

In accordance with California law, we may have collected the following categories of Personal Information within the preceding 12 months:

- Identifiers (for example, name, postal address, date of birth, email address, IP address, and online identifiers);
- Signature, Taxpayer Identification Number, telephone number, passport number, driver's license number, insurance policy number, account numbers, and other categories of Personal Information as defined by Cal. Civ. Code § 1798.80;
- Protected classifications under California or federal law (for example, age, citizenship status, national origin or ancestry);
- Commercial information (for example, records of services purchased or other purchasing histories);
- Internet or other electronic network activity information, including information on your usage of our Sites;
- Geolocation data;
- Sensory data (for example, video and audio recordings);
- Professional or employment-related information;
- Education information; and
- Inferences drawn from any information identified above.

On an as needed basis, and in accordance with our confidentiality obligations, we may disclose each of these categories of Personal Information with our co-counsel, referral counsel, or service providers for business purposes (for example, to facilitate our representation of you or to enable the service providers to provide their services) and as otherwise described in the "How We May Share Your Information" section above.

MM has not sold personal information about consumers within 12 month period preceding the date of this Privacy Policy.

2. Your Privacy Rights Under California Law

Under California law, subject to certain exceptions, California residents have the following rights with respect to their Personal Information:

Privacy Right	Description
Notice	You have the right to be notified of what categories of Personal Information will be collected at or before the point of collection and the purposes for which they will be used and shared.

Privacy Right	Description
Access	You have the right to request information on the categories of Personal Information that we collected in the previous twelve (12) months, the categories of sources from which the Personal Information was collected, the specific pieces of Personal Information we have collected about you, and the business purposes for which such Personal Information is collected and shared. You also have the right to request information on the categories of Personal Information which were disclosed for business purposes, and the categories of third parties in the twelve (12) months preceding your request for your Personal Information.
Erasure	You have the right to request to have your Personal Information deleted from our servers and we will direct our service providers to do the same. However, please be aware that we may not fulfill your request for deletion if we (or our service provider(s)) are required to retain your Personal Information for one or more of the following categories of purposes: (1) to complete a transaction for which the Personal Information was collected, provide a good or service requested by you, or complete a contract between us and you; (2) to ensure our website integrity, security, and functionality; (3) to comply with applicable law or a legal obligation, or exercise rights under the law; (4) to otherwise use your Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the information.

3. How to Enforce Your California Privacy Rights

If you would like to exercise your rights listed above, please send (or have your authorized agent send) an email to contact@forthepeople.com or call us toll-free at: 1-(844) 256-4550. You have a right not to receive discriminatory treatment by any business when you exercise of your California privacy rights.

While we take measures to ensure that those responsible for receiving and responding to your request are informed of your rights and how to help you exercise those rights, when contacting us to exercise your rights, we ask you to please adhere to the following guidelines:

- **Tell Us Which Right You Are Exercising:** Specify which right you want to exercise and the Personal Information to which your request relates (if not to you). If you are acting on behalf of another consumer, please clearly indicate this fact and your authority to act on such consumer's behalf.
- **Help Us Verify Your Identity:** Provide us with information to verify your identity. Please note that if we cannot initially verify your identity, we may request additional information to complete the verification process. Any Personal Information you disclose to us for purposes of verifying your identity will solely be used for the purpose of verification.

- **Direct Our Response Delivery:** Please provide us with an e-mail or mailing address through which we can provide our response. If you make the request by email, unless otherwise requested, we will assume that we can respond to the email address from which you made the request.

CHANGES TO THIS PRIVACY POLICY

MM may change this Privacy Policy from time to time to reflect changes in our practices or in applicable law. Such changes will be effective upon posting the revised Privacy Policy on our Services. You will be able to tell when this Privacy Policy was last updated by the Last Updated date included at the bottom of this Privacy Policy. By continuing to use our Services, or communicating electronically with us thereafter, you agree to accept such changes to this Privacy Policy.

CONTACT US

If you have any questions about this Privacy Policy or MM's information privacy practices, please contact us at:

E-mail: contact@forthepeople.com

Telephone: (407) 420-1414

Mail: Morgan & Morgan, PA, 850 3rd Avenue, Suite 402, Brooklyn, NY 11209

LAST UPDATED: December 23, 2019

Quick Links

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Trending News

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Top 10 Things Not to Do with Fireworks
Ten Killed, Dozens Unaccounted for in Building Collapse Near Miami Beach

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Most Asked Questions

Why Morgan & Morgan?
What Damages Are Available in Mass Torts?
Why File a Mass Tort?

[Read more](#)



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EXHIBIT 84

The New York Times

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Privacy Policy

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This Privacy Policy discloses the privacy practices for The New York Times newspaper and NYTimes.com (including international.nytimes.com, the online edition of The International New York Times), [The New York Times Home Delivery website](#), [The New York Times Neediest Cases Fund](#), [The New York Times Store](#), [Times Journeys](#) and [The New York Times Learning Network](#), our email newsletters and other applications owned and operated by The New York Times Company (collectively referred to as the "NYT Services"), and to any services that display this notice. For the purposes of this Privacy Policy, unless otherwise noted, all references to "The New York Times" include NYTimes.com and The New York Times newspaper.

The New York Times Replica Edition, maintained by NewspaperDirect, is governed by its own [Privacy Policy](#).

The New York Times advertising portal, for advertisers of The Times, also maintains a separate [Privacy Policy](#).

The NYT Services may contain links to other websites for your convenience and information. We are not responsible for the privacy practices or the content of those sites.

This Privacy Policy covers:

- [What information do we gather about you?](#)
- [What do we do with the information we collect about you?](#)
- [With whom do we share the information that we gather?](#)
- [What is our email policy?](#)
- [How do I change or update my personal information?](#)
- [How do I opt-out from receiving emails?](#)
- [Is my information protected?](#)
- [Compliance With Legal Process](#)
- [Children's Guidelines](#)
- [Your California Privacy Rights](#)
- [Changes to This Privacy Policy](#)

TRUSTe: The New York Times has received TRUSTe's Privacy Seal signifying that this privacy statement and our practices have been reviewed for compliance with the TRUSTe program viewable on the validation page available by clicking the TRUSTe seal.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact TRUSTe at <https://feedback-form.truste.com/watchdog/request>.



The TRUSTe program covers only information that is collected through the NYTimes.com website. The TRUSTe program does not cover information that may be collected through software downloaded from this site.

WHAT INFORMATION DO WE GATHER ABOUT YOU?

The information gathered when you interact with the NYT Services falls into two categories: 1) Personal information, which includes personal information you supply when you subscribe, order, complete a survey, register for one of our sites, enter a contest or provide your email address and 2) Non-personal information collected through technology, which includes tracking information collected by us as well as third parties.

Personal Information That You Give Us Or Ask a Third Party to Share with Us

Registration Information

Registration for the NYT Services may require that you supply certain personal information, including a unique email address and demographic information (ZIP code, age, sex, household income, job industry and job title) to register.

You may register or enhance your profile by linking your Facebook or Google accounts on NYTimes.com. By doing this, you are asking them to send us certain information from those social media accounts, and you are authorizing us to collect, store, and use what they send us in accordance with this Privacy Policy. You can unlink your social media accounts or control what they share from their privacy controls.

Social media registration features may collect your IP address, the page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are either hosted by a third party or hosted directly on our web site.

You can disassociate your NYTimes.com registration from third-party accounts any time. For more detail, please see our [Social Media FAQ](#).

Billing and Credit Card Information

To enable payment and donations via the NYT Services, we collect and store name, address, telephone number, email address, credit card information and other billing information. This information will only be shared with third parties who help to complete the purchase transaction. Examples of this include fulfilling orders and processing credit card payments.

User Generated Content and Public Activities (Including Comments, Reader Reviews and TimesPeople)

We offer you opportunities to engage in public activities on NYTimes.com and other NYT Services. "Public activities" are any actions you take on NYTimes.com that are designed to be visible to other users, including comments, recommendations, reader reviews, ratings or any other items that you submit. Any information you disclose in your public activities, along with your screen name or ID, or any image or photo, becomes public and may be used by The New York Times for online and offline promotional or commercial uses in any and all media. If you choose to engage in public activities, you should be aware that any personal information you submit can be read, collected and used by other users of these areas. We are not responsible for the personal information you choose to submit in the course of your public activities and we have no responsibility to publish, take down, remove or edit any of your public activities or submissions. For more information, see the [Comments FAQ](#) and read the Forums, Discussions and User Generated Content section of the [Terms of Service](#).

Public activities may be included in our RSS feeds, APIs and other distribution formats. As a result, your public activities may appear on other websites, blogs, or feeds. Keep in mind that we are not responsible for any personal information you choose to make public via your public activities, and you agree that such sharing will be deemed to have been done by you, not The New York Times. Please see our [Comments FAQ](#) for additional information.

When you share or recommend links to content on a third-party platform (such as Facebook, Google+ and Twitter), that action and any information you share will be covered by their privacy policy.

Contests, Sweepstakes and Special Offers

The New York Times collects personal information from you when you participate in sweepstakes, contests or special offers. If this information is also being collected by a third party other than The New York Times, we will notify you at the same time. If you do not want any personal information shared, you should not participate in the sweepstakes, contest or special offer.

Reader Surveys, Reader Panels and Market Research

The New York Times may collect personal information from you in connection with voluntary surveys conducted via the NYT Services. Data may be collected through the NYT Services, on the phone or through the mail. The information you provide may be shared, but only in the aggregate, with advertisers and partners unless we notify you otherwise at the time of collection.

Members of our Reader Panels agree to participate in surveys, polls or discussions about their readership of The New York Times, their household/personal characteristics and their purchase behavior. Our panels are currently administered by [Vision Critical](#) and [Beta Research](#).

Conferences and Live Events

We often receive information about attendees to our live events from sign-in and registration lists. We may share this information with event or promotion sponsors, in which case we will notify you when we collect the information.

Non-Personal Information Collected Using Technology

Information Collected by Us Using Technology

We use various Internet technologies to manage the NYT Services and track use of the Services. Non-personal information that we collect using these technologies may be combined with other information about you.

Device Information. We may collect non-personal information about the computer, mobile device or other device you use to access the NYT Services, such as IP address, geolocation information, unique device identifiers, browser type, browser language and other transactional information.

Cookies, Beacons, Local Storage and Other Similar Technologies. We use "cookies," Web beacons, HTML5 local storage and other similar technologies. These technologies allow us to manage access to and use of the Services, recognize you and provide personalization, and help us understand how people use the NYT Services. You will not be able to access certain areas of our websites, including NYTimes.com, if your computer does not accept cookies from us. We do not respond to browser-based "do not track" signals. For more detailed information about our use of cookies and local storage, and how to manage them, see [Frequently Asked Questions About Cookies and Similar Technologies](#) in our Help section.

We may transmit non-personally identifiable website usage information to third parties in order to show you advertising for The New York Times when you visit other sites. For more information about our third-party ad server, or to learn your choices about not having this non-personal information used to target ads to you, please [click here](#).

Analytics, Log Files and Reading History

As is true of most web sites, we gather certain information automatically and store it in log files. This information may include Internet protocol (IP) addresses (the region or general location where your computer or device is accessing the Internet), browser type, operating system and other usage information about the use of the NYT Services, including a history of the pages you view.

We may combine this automatically collected log information with other information we collect about you. We do this to improve services we offer you, including customized Recommendations, advertising and currency display, to improve marketing, and to track access and use of the NYT Services across the devices that you use to access the NYT Services.

For more information on the Recommendations feature, please read the [Recommendations FAQ](#).

We have hired third parties to provide us information, reports and analysis about the usage, browsing patterns of our users. They may independently record the type of device and operating system you are using, general location information, as well as events that occur within our apps, such as how often you use our apps.

Location Information. Some of our mobile applications can deliver content based on your current location if you choose to enable that feature of the app. If you enable the location-based feature, your current location will be stored locally on your device, which will then be used by the app. If you elect to have a location-based search saved to your history, we will store that information on our servers. If you do not enable the location-based service, or if an app does not have that feature, the app will not transmit to us, and we will not collect or store, location information.

The ads in our apps are not targeted to you based on your current GPS location, but they may be targeted to you based on your ZIP code or device's IP address.

Third Parties

Some of the services and advertisements included in the NYT Services, including on NYTimes.com and within our mobile apps, are delivered or served by third-party companies, which may collect information about your use of the NYT Services.

These companies may place or recognize cookies, Web beacons or other technology to track certain non-personal information about our website users. For example, in the course of serving certain advertisements, an advertiser may place or recognize a unique cookie on your browser in order to collect certain information about your use of the NYT Services. For another example, an advertiser or ad server may also be able to collect your device's unique identifier in the course of serving an ad. In many cases, this information could be used to show you ads on other websites based on your interests.

We do not have access to, nor control over, these third parties' use of cookies or other tracking technologies or how they may be used.

Please [click here](#) to see a list of third parties that may be using cookies to serve advertising on our websites or in our apps. For example, we use Google to serve advertisements onto the NYT

Services, which use the Google Doubleclick cookie, and in some cases, a unique device identifier, to show you ads based on your visit to NYTimes.com and other sites on the Internet. You may opt out of the use of the Google Doubleclick cookie by visiting the [Google ad and content network privacy policy](#).

You have choices about the collection of information by third parties on our website:

- 1) If you would like more about your option not to accept advertiser cookies, please [click here](#).
- 2) If you would like to opt-out of having interest-based ad targeting, [click here](#).

Your access to our websites should not be affected if you do not accept cookies served by third parties.

WHAT DO WE DO WITH THE INFORMATION WE GATHER ABOUT YOU?

Provide the Services You Request

We use the information we gather about you to enable your use of the NYT Services and fulfill your requests for certain products and services, such as sending out electronic newsletters and enabling you to participate in and renew paid services, polls, contests and message boards.

Statistical Analysis

We perform statistical, demographic and marketing analyses of users of the NYT Services, and their subscribing and purchasing patterns, for product development purposes and to generally inform advertisers about the nature of our subscriber base. We use this information for analysis purposes, including analysis to improve customer relationships.

Customizing Your Experience

We use the information that we collect to allow advertising to be targeted to the users for whom such advertising is most pertinent. We also use this information to customize certain features of the NYT Services to provide you with an enhanced experience based on the type of device you are using to access the NYT Services, and in certain cases, provide you with requested services.

Relevant Advertising

We may use demographic and preference information to allow advertising on the NYT Service to be targeted to the users for whom they are most pertinent. This means users see advertising that is most likely to interest them, and advertisers send their messages to people who are most likely to be receptive, improving both the viewer's experience and the effectiveness of the ads. We disclose information to third parties only in aggregate or de-identified form.

Email Newsletters

The New York Times will periodically send you email newsletters or promotional email about services offered by The New York Times and its advertisers. For details about New York Times email, please see the section labeled "[What Is Our Email Policy?](#)"

WITH WHOM DO WE SHARE THE INFORMATION THAT WE GATHER?

Within The New York Times

If you have registered to use the NYT Services, we will not sell, rent, swap or authorize any third party to use your email address without your permission.

In the future, we may sell, buy, merge or partner with other companies or businesses. In such transactions, we may include your information among the transferred assets.

Third Parties

We also share information about our audience in aggregate or de-identified form. Nothing in this Privacy Policy is intended to restrict our use or sharing of aggregated or de-identified information in any way.

If you are a print subscriber, we may exchange or rent your name and mailing address (but not your email address) and certain other information, such as when you first subscribed to The New York Times with other reputable companies that offer marketing information or products through direct mail. If you prefer that we do not share this information, you may opt-out by emailing us at opt-out@nytimes.com, or write to us at Customer Care, P.O. Box 8041 Davenport IA 52808-8041. Please include your account number and phone number in the body of your email or letter, and include "Opt-out" in the subject line.

We may share information about attendees to our live events with sponsors or other third parties. If so, we will notify you when you provide us the information.

Service Providers

We contract with other companies to provide services on our behalf, including credit-card and billing processing, ad serving, shipping, email distribution, list processing and analytics or promotions management. We provide these companies only with the information they need to perform their services. These service providers are restricted from using personal information in any way other than to provide services for The New York Times, and they may not share, resell or use the data for their own direct marketing purposes.

We reserve the right to disclose your opt-out information to third parties so they can suppress your name from future solicitations, in accordance with applicable laws. We may occasionally release personal information as required by law, for example, to comply with a court order or subpoena. (For more information, see the "Compliance with Legal Process" section of this policy.)

WHAT IS OUR EMAIL POLICY?

The New York Times complies with the federal CAN-SPAM Act of 2003. We will not send you marketing messages if you have opted out. You can choose not to receive messages in the future by either (1) following the "unsubscribe" instructions located near the bottom of each email, or (2) you can opt-out here. We will not share, sell, rent, swap or authorize any third party to use your email address for commercial purposes without your permission. If you feel you have received an email from us in error, please contact feedback@nytimes.com.

Email Newsletters. The New York Times offers several email newsletters. If you no longer wish to receive a specific newsletter, follow the "unsubscribe" instructions located near the bottom of each newsletter. To manage your newsletter preferences, please [click here](#).

Survey Email. We may invite you to participate in user surveys asking for feedback on NYTimes.com and existing or prospective products and services, as well as information to better understand our users. User surveys greatly help us to improve the NYT Services, and any information we obtain in such surveys will not be shared with third parties, except in aggregate form.

Emails From You. If you send us an email, we will use your email address to respond directly to your questions or comments.

Email This Article Feature. Addresses you provide in the "Email" share feature may be saved for your convenience for future articles you may wish to email; but they are not used for any other purpose, and will not be shared with any third parties.

HOW DO I CHANGE OR UPDATE MY PERSONAL INFORMATION?

The New York Times Home Delivery Web Account. You may update and/or edit your Home Delivery account information online at the Home Delivery website by clicking on the link for [Update Account](#). Should you require assistance, please call our toll free number, 1-800-NYTIMES.

Manage Your NYTimes.com Account in the My Account Area. You may review and update your NYTimes.com membership or account information and access your transaction history in the My Account area.

Manage Your New York Times Events Account. Events include TimesTalks, Great Read in the Park, Arts and Leisure Weekend, Sunday with The Magazine and The New York Times Travel Show. To subscribe or unsubscribe from The New York Times Events email newsletter, please visit www.nytimes.com/events. Enter your email address in the field provided, select "unsubscribe" and click "submit."

HOW DO I OPT-OUT?

If, at any time, you prefer not to receive email marketing information from us, simply follow the unsubscribe options at the bottom of each email.

If you experience difficulty with the unsubscribe process, feel free to contact us at feedback@nytimes.com and provide your email address along with the name of the newsletter from which you would like to unsubscribe.

Mail or Telephone Promotions

If, at any time, you prefer not to receive mail or telephone solicitations originated by The New York Times Home Delivery Department, or if you prefer that we do not share this information with third parties for marketing purposes, please email us at opt-out@nytimes.com or write to us at Customer Care, P.O. Box 8041, Davenport, IA 52808-8041. Please include your account number and phone number in the body of your email or letter, and put "Opt-out" in the subject line.

IS MY INFORMATION PROTECTED?

To prevent unauthorized access, maintain data accuracy and ensure the appropriate use of information, we have put in place commercially reasonable physical, technical and administrative

controls to protect the information. Please note that no method of transmission over the Internet, or method of electronic storage, is 100% secure.

OTHER INFORMATION

Compliance With Legal Process

We may access, preserve and disclose personal information if we are required to do so by law or we have a good faith belief that such action is necessary to (1) comply with the law or with legal process; (2) protect and defend our rights and property; (3) protect against misuse or unauthorized use of the NYT Services; or (4) protect the personal safety or property of our users or the public (among other things, this means that if you provide false information or attempt to pose as someone else, information about you may be disclosed as part of any investigation into your actions).

Children's Guidelines

COPPA Compliance. Except for The Learning Network (see below), The New York Times does not knowingly collect or store any personal information about children under the age of 13.

The Learning Network. The Learning Network is a blog for parents, teachers and students that is freely available outside of the New York Times digital subscription service, and does not require registration. Students 13 and older are invited to post comments with their first names only on any open posts in the blog in accordance with New York Times Commenting practice. Though an email address must be provided in order to post a comment, it is not shared or sold to third parties, and does not appear publicly on the blog. To review or remove the optional email address (personal information collected), please use [this form](#) to contact the Learning Network.

For any questions concerning The Learning Network, please contact Katherine Schulten, NYTimes.com, 620 Eighth Avenue, 2nd floor, New York, NY 10018. Telephone: (212) 556-8391.

Your California Privacy Rights

Under the California "Shine The Light" law, California residents may opt-out of the NYT's disclosure of personal information to third parties for their direct marketing purposes. As detailed above, you may choose to opt-out of the sharing of your personal information with third parties for marketing purposes at any time by submitting a request in writing to Customer Care, P.O. Box 8041, Davenport, IA 52808-8041 or by emailing us at opt-out@nytimes.com. It is important to note that this opt-out does not prohibit disclosures made for non-marketing purposes.

Changes to This Policy

This Privacy Policy may be amended from time to time. Any such changes will be posted on this page. If we make a significant or material change in the way we use your personal information, the change will be posted on this page thirty (30) days prior to taking effect and registered users will be notified via email.